TSD File Inventory Index

Date: Sept. 27 2006

Initial: [illegible]

Facility Name: Velsicol Corporation (Third Street Site – [illegible] Site)

Facility Identification Number: ILD 052 437 506

A.1 General Correspondence	Y	**B.2 Permit Docket (B.1.2)**	Y
A.2 Part A / Interim Status	Y	.1 Correspondence	Y
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	Y	**C.1 Compliance - (Inspection Reports)**	Y
.3 Part A Application and Amendments	Y	**C.2 Compliance/Enforcement**	Y
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	Y
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	Y	.3 State Prelim. Investigation Memos	
.1 Correspondence	Y	.4 RFA Reports	Y
.2 Closure/Post Closure Plans, Certificates, etc		**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total [illegible]

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.
Comments: One folder/set

A.1 Public Participation

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

ILLINOIS EPA NO.: 161025001
USEPA NO.: ILD052437306
NOTICE NO.: RAP-01-01

DATE: July 30, 2001

PUBLIC NOTICE of DRAFT REMEDIAL ACTION PLAN PERMIT

The Illinois Environmental Protection Agency (EPA) hereby gives notice of intent to issue a Resource Conservation and Recovery Act (RCRA) Remedial Action Plan (RAP) permit to Valspar Corporation (Valspar) and Timberline Pallet and Skid, Inc. (Timberline) for the former Valspar Coatings site at 2500 8th Ave., East Moline, now owned and operated by Timberline. The facility's mailing address is Timberline Pallet and Skid, Inc., P.O. Box 631, East Moline, IL 61244-0631. A draft permit has been prepared which, if finalized, will allow Valspar to temporarily pile excavated contaminated soil in an on-site staging pile, treat the excavated soil in an indirect heat volatilization steam injection (IHV) unit, and to temporarily place treated soil in another on-site soil pile for confirmation sampling before being replaced in the excavation. Valspar will perform the remedial work at the site although the property owner is a co-permittee. Oversight of remedial activities at this site will be performed under the Illinois EPA's Site Remediation Program.

Interested citizens are invited to review copies of the RAP permit application, draft permit decision and related technical fact sheet at the following location:

East Moline Public Library
740 16th Ave.
East Moline, IL 61244

Interested citizens may submit written comments on the permit decision documents during the 45-day comment period. Send all comments to the Public Involvement Coordinator listed at the end of this Notice postmarked by midnight September 17, 2001. In response to public requests or at the discretion of Illinois EPA, a public hearing can be held to clarify one or more issues concerning the draft permit decision. A request for a public hearing must be made in writing, must state opposition to the permit, and must

state the nature of the issue(s) to be raised at the hearing. Written requests should be sent to the Public Involvement Coordinator listed below. Public notice will be issued 45 days before any hearing.

All comments submitted will become part of the Administrative Record and will be evaluated by Illinois EPA in making the final permit decision. The Agency will respond to comments on the draft permit decision, and indicate whether additional documents have been included in the Administrative Record. Anyone who submits written comments will be notified of the final permit decision and the permit decision appeal process.

The Illinois EPA is authorized to administer the federal hazardous waste management permit program in Illinois. The RAP permit review is an expedited process to enable site cleanup efforts to move forward quickly when hazardous remediation wastes are identified and require on-site treatment, storage or disposal.

The permit application, draft permit decision, related information and all data submitted by the applicant, as part of the Administrative Record, are now available for public inspection Monday through Friday between 9:00 a.m. and 5:00 p.m. by appointment only. PLEASE TELEPHONE AHEAD FOR AN APPOINTMENT TO VIEW THE DOCUMENTS. Please contact:

Mara McGinnis, Public Involvement Coordinator
Office of Community Relations
Illinois EPA
1021 North Grand Ave., East
P.O. Box 19276
Springfield, Illinois 62794-9276
217/524-3288 (TDD 217782-9143)

###

A.2 Part A/
Interim Status

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST
CHICAGO, ILLINOIS 60604

AUG 9 1983

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Jerald Gorder, Plant Manager
The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

RE: Interim Status Acknowledgement USEPA ID No. IL D052437506
FACILITY NAME: The Valspar Corporation

Dear Mr. Gorder:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for interim status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for interim status. Our opinion will be reevaluated on the basis of this information.

The State of Illinois has received Phase I interim authorization under Section 3006 of RCRA. Because of this authorization you are required to comply with standards prescribed in 35 Illinois Administrative Code, Subtitle G, Chapter I, Subchapter c, Part 725, in lieu of the standards in 40 CFR 265. In addition, you are reminded that operating under interim status does not relieve you of the need to comply with other applicable Federal, State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from the Part A permit application that was sent to USEPA. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR 122.23 and as State regulations allow.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR 122.23; your facility may operate under interim status until such time as an RCRA permit is issued or denied. This will be preceded by a request from this office or the Illinois Environmental Protection Agency for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

If you have questions concerning the Illinois hazardous waste regulations, please contact Mr. Robert Kuykendall at the Illinois EPA, 2200 Churchill Road, Springfield, Illinois 62706. His phone number is (217) 782-6760.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure
cc: A. J. Espinel

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

5HW-13

16 MAY 1983

Mr. Jerald Gorder, Plant Manager
The Valspar Corporation
2500 8th Avenue
East Moline, IL 61244

RE: Hazardous Waste Permit Application-Incomplete Part A
Facility Name (and EPA ID number) ILD 052 437 506 The Valspar Corporation
Facility Address 2500 8th Avenue East Moline, IL 61244

We have completed our review of your Part A RCRA permit application for the facility referenced above. The application was incomplete; therefore, we are returning it to you along with a checklist which indicates the missing items. Please complete all missing items marked with an asterisk (*) on the application form, and return the form in time to reach this office by June 16, 1983. All other missing items marked on the checklist should be completed and may be forwarded to this office under separate cover by June 16, 1983.

All of these items are necessary in order for the U.S. Environmental Protection Agency to determine whether your facility qualifies for interim status. Once you receive interim status, your facility may continue operating under the interim status standards until such time as a Part B application is requested by USEPA. At that time, you will have up to six months to submit the Part B portion of the application and to show that you comply with the final detail technical standards.

Please note that some of your original entries on the forms may be changed. We have coded your forms to accommodate key punching for subsequent computer processing; all of our coding was done in blue ink only.

If you have any questions or wish to discuss the missing items on the checklist, please feel free to contact Diane Parker, the reviewer of your application, at (312) 886-3714 or me at (312) 886-7449.

Sincerely yours,

Arthur S. Kawatachi

Arthur S. Kawatachi
Regional Project Officer

Enclosure

P.S. All missing items marked with an asterisk must be submitted to us with a cover letter signed by the appropriate certifying official (Item XIII on Form 1 and/or Item IX and X on Form 3) or his duly authorized representative.

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

0 6 AUG 1982

Mr. Timothy Jones, Plant Manager
Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

RE: Part A Application (Paint Waste)
FACILITY NAME: Valspar Corporation
USEPA ID NO.: ILD 052 437 506

Dear Mr. Jones:

This letter serves to acknowledge that the United States Environmental Protection Agency (USEPA) has processed your Part A Hazardous Waste Permit Application. Our review indicates your facility may not require a permit under §3005 of the Resource Conservation and Recovery Act (RCRA); however, further clarification is needed.

Please be advised that wastes from painting operations and paint production (USEPA Hazardous Waste Nos. F017, F018, K078, K079, K081, K082) have been temporarily suspended from regulation pending further study (40 CFR Part 261.31 and 261.32, Federal Register January 16, 1981). Wastes which exhibit characteristics of ignitability, corrosivity, reactivity, or EP toxicity as defined in 40 CFR Part 261 Subpart C, or which are listed in 40 CFR Part 261 Subpart D remain subject to regulation under RCRA.

Please reexamine your wastes pursuant to 40 CFR Part 262.11 (enclosed) and submit a revised Part A application to the Regional Office within 60 days if your waste is hazardous and regulated. If you find that your waste is not regulated, please withdraw your permit application. Your written withdrawal request, with a detailed explanation, must be signed and certified by an authorized person in accordance with 40 CFR Part 122.6 (enclosed). Withdrawal of the permit application will eliminate further mandated permit processing procedures. Unless we receive a reply within 60 days, we will assume that your waste is regulated and that your facility is subject to the interim status standards including the financial responsibility and Part B permit requirements.

Please contact the Technical, Permits, and Compliance Section at (312) 353-2197, for additional information and copies of blank Part A applications. Please refer to "Part A Application, Paint Waste" in all correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures

No. 313815

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO
Jerald Gorder Valspar Corp

STREET AND NO.
2500 8th Avenue

P.O., STATE AND ZIP CODE
East Moline, IL 61244

POSTAGE	$
CERTIFIED FEE	¢
SPECIAL DELIVERY	¢
RESTRICTED DELIVERY	¢
RETURN RECEIPT SERVICE — SHOW TO WHOM AND DATE DELIVERED	¢
RETURN RECEIPT SERVICE — SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
RETURN RECEIPT SERVICE — SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
RETURN RECEIPT SERVICE — SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES	$
POSTMARK OR DATE	

CONSULT POSTMASTER FOR FEES
OPTIONAL SERVICES

PS Form 3800, Apr. 1976

MAY 17 1983 CHICAGO, IL LOOP

D052 437 506 PA

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

The following service is requested (check one.)
- ☐ Show to whom and date delivered.....¢
- ☐ Show to whom, date and address of delivery.¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered.....¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.$

(CONSULT POSTMASTER FOR FEES)

ARTICLE ADDRESSED TO:
Jerald Gorder Valspar Corp.
2500 8th Avenue
East Moline, IL 61244

ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	313815	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☒Authorized agent
X Sherry Coleman

DATE OF DELIVERY 5-18-83

POSTMARK MAY 18 1983 EAST MOLINE IL

ADDRESS (Complete only if requested)

UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

RETURN TO

☆GPO : 1979-288-848

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.: ILD052437506

NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS:
VALSPAR CORPORATION
2500 8TH AVE
EAST MOLINE, IL 61244

000815 AUG 1980

III. LOCATION OF INSTALLATION:
2500 8TH AVE
EAST MOLINE, IL 61244

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F ILD052437506 T/A C	A	800818

I. NAME OF INSTALLATION
THE VALSPAR CORPORATION

II. INSTALLATION MAILING ADDRESS
STREET OR P.O. BOX: 2500 8th Avenue

CITY OR TOWN: East Moline | ST.: IL | ZIP CODE: 61244

IIa. LOCATION OF INSTALLATION
STREET OR ROUTE NUMBER: 2500 8th Avenue

CITY OR TOWN: East Moline | ST.: IL | ZIP CODE: 61244

IV. INSTALLATION CONTACT
NAME AND TITLE (last, first, & job title): Sonnee Raymond Plant Manager

PHONE NO. (area code & no.): 309-752-1450

V. OWNERSHIP
A. NAME OF INSTALLATION'S LEGAL OWNER: The Valspar Corporation

B. TYPE OF OWNERSHIP (enter the appropriate letter into box): M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

- [X] A. GENERATION
- [ ] B. TRANSPORTATION (complete item VII)
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es))

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

ILD052437506

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.: ILD052437506

IX. DESCRIPTION OF HAZARDOUS WASTES
Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

AUG 18 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S														T/A	C
W	I	L	D	0	5	2	4	3	7	5	0	6	2		1
1	2											13	14		15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F003	F005				
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K078	K079	K080	K082		
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U112	U140	U154	U159	U220	U239
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☒ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☒ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Raymond Sonnee	Raymond R. Sonnee, Plant Manager	8/15/80

DETACH

DETACH

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
CSA No. 0246-EPA-OT

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

I. INSTALLATION'S EPA I.D. NO.

A. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

ILD052437506

THE VALSPAR CORPORATION
2500 8TH AVENUE
EAST MOLINE, ILLINOIS 61244

000940 DEC 19 80

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F ILD052437506 T/A 1	A	801118

I. NAME OF INSTALLATION

~~THE~~ VALSPAR CORPORATION THE

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 2500 8th Avenue

CITY OR TOWN: East Moline | ST.: IL | ZIP CODE: 61244

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 2500 8th Avenue

CITY OR TOWN: East Moline | ST.: IL | ZIP CODE: 61244

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title): Jones Timothy Plant Manager

PHONE NO. (area code & no.): 309-752-1450

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: THE VALSPAR CORPORATION

B. TYPE OF OWNERSHIP (enter the appropriate letter into box): M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

- [X] A. GENERATION
- [ ] B. TRANSPORTATION (complete item VII)
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es))

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [ ] A. FIRST NOTIFICATION
- [X] B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.: ILD052437506

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

NOV 18 1980

CONTINUE ON REVERSE

FOR OFFICIAL USE ONLY

S												T/A	C
W	K	D	0	5	4	3	5	0	6	5			I
1	2										13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

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43	44	45	46	47	48

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49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

- [X] 1. IGNITABLE (D001)
- [ ] 2. CORROSIVE (D002)
- [ ] 3. REACTIVE (D003)
- [X] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Timothy Jones by Jane	Timothy Jones, Plant Manager	10-7-80

DETACH A

DETACH A

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ ILD052437506 REACKNOWLEDGEMENT

VALSPAR CORPORATION THE
2500 8TH AVE
EAST MOLINE IL 61244

INSTALLATION ADDRESS ➤

2500 8TH AVENUE
EAST MOLINE IL 61244

EPA Form 8700-12B (4-80)

09/28/81

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ ILD052437506 REACKNOWLEDGEMENT

VALSPAR CORPORATION THE
2500 8TH AVE
EAST MOLINE IL 61244

INSTALLATION ADDRESS ➤

2500 8TH AVENUE
EAST MOLINE IL 61244

EPA Form 8700-12B (4-80)

08/14/81

The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244
(309) 752-1450

June 7, 1983

Ms. Diane Parker
United States Environmental Protection Agency
Region 5
230 South Deerborn Street
Chicago, Illinois 60604

ILD 052 437 506 PA, G, TSD, PAS1

Attention: RCRA Activities 5HW-13

Dear Ms. Parker:

In response to your request, the attached Form 1 and 3 have been modified and signed by Corporate authorized signature to meet with your requirements.

If there are any additional questions or comments, please feel free to contact me.

Sincerely,

THE VALSPAR CORPORATION

Jerald J. Gorder
Plant Manager - East Moline

JJG/cd

Attach.

CERTIFIED

No. 831907

MAIL

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

S													T/A	C
F	I	L	D	0	5	2	4	3	7	5	0	6		D

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

ILD052437506

PLEASE PLACE LABEL IN THIS SPACE

The Valspar Corporation
2500 - 8th Avenue
East Moline, IL 61244

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		XX	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge to waters of the U.S.**? (FORM 2B)		XX	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		XX	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		XX	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	XX		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		XX	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		XX	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		XX	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		XX	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		XX	

III. NAME OF FACILITY

1 SKIP THE VALSPAR CORPORATION

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 GORDER, JERALD PLANT MANAGER	309 752 1450

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX	
3 2500 - 8TH AVENUE	

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 EAST MOLINE	IL	61244

RECEIVED
OCT 12 1982
WASTE MANAGEMENT BRANCH

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	
5 500 - 8TH AVENUE	

B. COUNTY NAME	
ROCK ISLAND	

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 EAST MOLINE	IL	61244	

10/12/82

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
2851 (specify) PAINT MANUFACTURER	(specify)
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME

THE VALSPAR CORPORATION

B. Is the name listed in Item VIII-A also the owner? ☐ YES ☐ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC (other than federal or state)
O = OTHER (specify)

P (specify)

D. PHONE (area code & no.)

309 752 1450

E. STREET OR P.O. BOX

2500 - 8TH AVENUE

F. CITY OR TOWN

EAST MOLINE

G. STATE

IL

H. ZIP CODE

61244

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
N	P
B. UIC (Underground Injection of Fluids)	**E. OTHER** (specify)
U	(specify)
C. RCRA (Hazardous Wastes)	**E. OTHER** (specify)
R	(specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Manufacture of paints

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
A.J. Espinel Jerald Gorder, Plant Manager	Jerald Gorder	11-23-82 10/1/82

COMMENTS FOR OFFICIAL USE ONLY

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S												T/A	C
F	I	L	D	0	5	2	4	3	7	5	0	6	1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

☐ 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	58	06	01

☐ 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

☒ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S												T/A	C
C	D	U	P										1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G	
X-2	T03	20	E	
1	S01	5,000	G	
2				
3				
4				
5				
6				
7				
8				
9				
10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.
NOTE: Photocopy this page before completing ___ ou have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)

													T/A	C
W	I	L	D	0	5	2	4	3	7	5	0	6		1

FOR OFFICIAL USE ONLY

													T/A	C		
W	D	U	P											2	D	U	P

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D001	128,500	P	S01	Stored in drums
2	D002	4,000	P	S01	Stored in drums
3	D008	2,000	P	S01	Stored in drums
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

F	I	L	D	0	5	2	4	3	7	5	0	6	T/A	6

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
90 25 00.3	041 31 01.2

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E: The Valspar Corporation	309-752-1450

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F: 2500 - 8th Avenue	G: East Moline	IL	61244

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
A.J. Espinel Jerald J. Gorder	Espinel Jerald J. Gorder	1/23/83 10/1/82

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
A.J. Espinel Jerald J. Gorder	Espinel Jerald J. Gorder	1-20-83 10/1/82

The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244
(309) 752-1450

October 1, 1982

Mr. Karl J. Klepitsch, Jr.
Environmental Protection Agency
RCRA Activities
Region V
P.O. Box A3587
Chicago, IL 60690-3587

ILD 052437506 PT A GEN TSDF

Dear Sir:

Please find attached revised "Part A Application". This is being submitted pursuant to your letter of notification on temporary suspension of certain hazardous waste numbers.

The attached application reflects these changes, as well as inclusion of my name as current contact person at this facility.

Sincerely yours,

THE VALSPAR CORPORATION

Jerald J. Gorder
Plant Manager

JJG/tc

Enc.

RECEIVED
OCT 12 1982
WASTE MANAGEMENT BRANCH
EPA, REGION V

RECEIVED
10/12/82


CERTIFIED
P12 0239196
MAIL

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

102

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

S: F | I L D 0 5 2 4 3 7 5 0 6 | T/A: 3 | C: D

LABEL ITEMS

- II. EPA I.D. NUMBER
- III. FACILITY NAME
- V. FACILITY MAILING ADDRESS
- VI. FACILITY LOCATION

ILD052437506

~~THE~~ VALSPAR CORPORATION
2500 8th Avenue
East Moline, Illinois 61244

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge to waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges to waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP ~~THE~~ VALSPAR CORPORATION

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 TIMOTHY JONES PLANT MANAGER	309 752 1450

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
3 2500 8th Avenue			
B. CITY OR TOWN	**C. STATE**	**D. ZIP CODE**	
4 East Moline Illinois	IL	61244	

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
5 2500 8th Avenue			
B. COUNTY NAME			
Rock Island			
C. CITY OR TOWN	**D. STATE**	**E. ZIP CODE**	**F. COUNTY CODE (if known)**
6 East Moline	IL	61244	161

NOV 14 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
2851 (specify) Paint Manufacturer	(specify)
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: THE VALSPAR CORPORATION

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL, S = STATE, P = PRIVATE, M = PUBLIC (other than federal or state), O = OTHER (specify)
P (specify)

D. PHONE (area code & no.): A 309 752 1450

E. STREET OR P.O. BOX: 2500 8th Avenue

F. CITY OR TOWN: East Moline

G. STATE: IL

H. ZIP CODE: 61244

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N I IL 0003255	9 P I
B. UIC (Underground Injection of Fluids)	**E. OTHER (specify)**
9 U I	9 I (specify)
C. RCRA (Hazardous Wastes)	**E. OTHER (specify)**
9 R I	9 I (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. F9: A/50

XII. NATURE OF BUSINESS (provide a brief description)

Manufacture of Paints

F9: A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Timothy Jones, Plant Manager	Timothy Jones	10/7/80

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 char s/inch).

Form Approved OMB No. 158-S80004 102

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S: F T 1 D 0 5 2 4 3 7 5 0 6 T/A: 3 C: 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

- [X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*
- [ ] 2. NEW FACILITY *(Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left): C 8 | YR. 58 | MO. 06 | DAY 01

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN: YR. | MO. | DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

- [ ] 1. FACILITY HAS INTERIM STATUS
- [ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S: C DUP T/A: 3 C: 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G	
X-2	T03	20	E	
1	S01	5000000	G	
2				
3				
4				

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
5				
6				
7				
8				
9				
10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

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NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													T/A	C
W	I	L	D	0	5	2	4	3	7	5	0	6	3	1

FOR OFFICIAL USE ONLY															T/A	C				
W	D	U	P												3	2	D	U	P	

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	K 0 7 8	80,000 000	P	S 0 1	Drums stored
2	K 0 7 9	40,000 000	P	S 0 1	Drums stored
3	K 0 8 2	500 000	P	S 0 1	Air collectors - drums stored
4	D 0 0 1	8,000 000	P	S 0 1	
5	K 0 8 0	4,000 000	P	S 0 1	
6	D 0 0 8	2,000 000	P	S 0 1	
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

F: I L D 0 5 2 4 3 7 5 0 6 | T/A: 3 | C: 6

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* F6: A/50

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* F6: A/51

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
41 31 12Ø (corrected: 90 25 03)	090 25 30 (corrected: 041 31 12)

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E: THE VALSPAR CORPORATION	309-752-1450

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F: 2500 8th Avenue	G: East Moline,	IL	61244

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Timothy Jones	Timothy Jones	10-7-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Timothy Jones	Timothy Jones	10-7-80

Form Approved OMB No. 158-S80004

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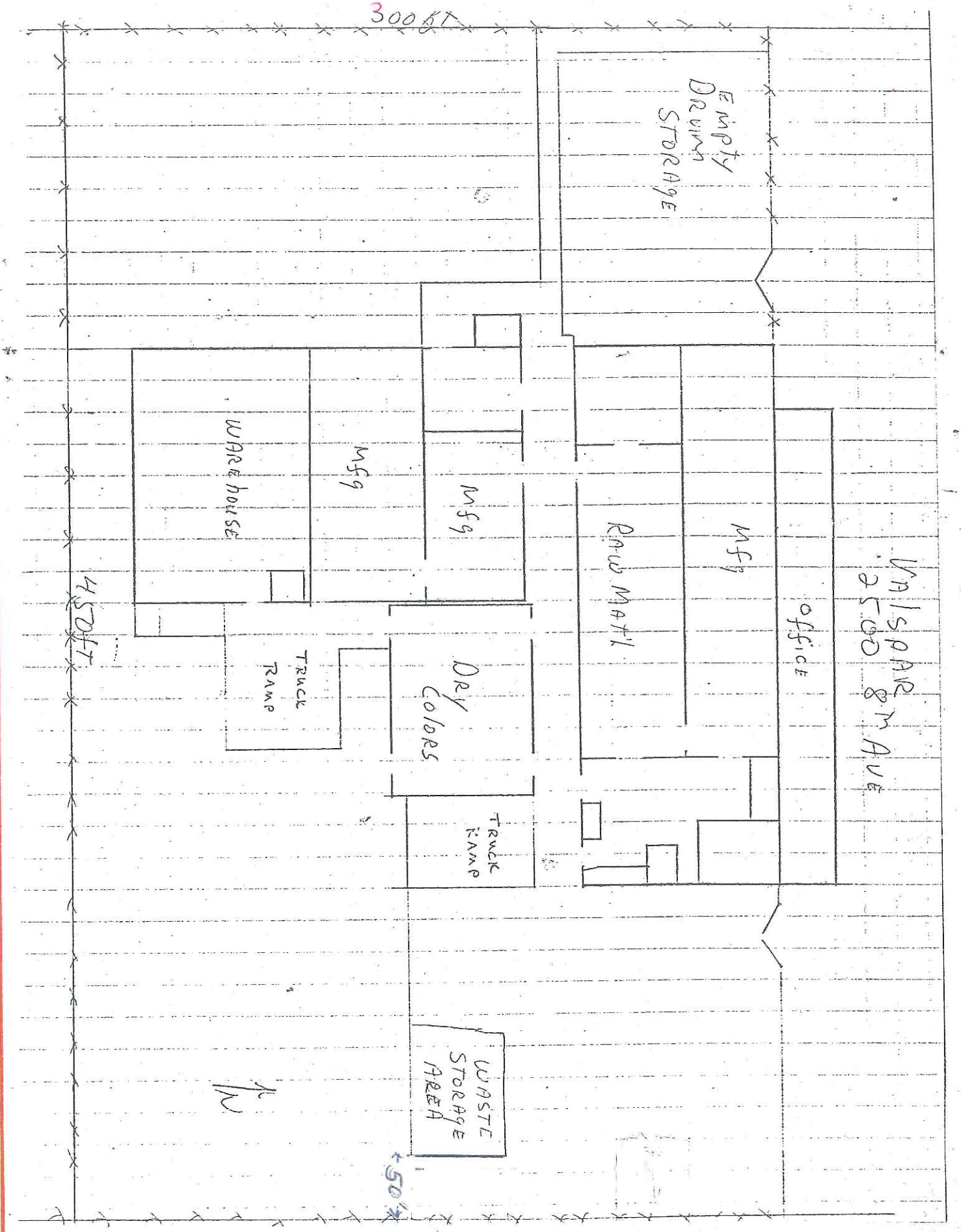
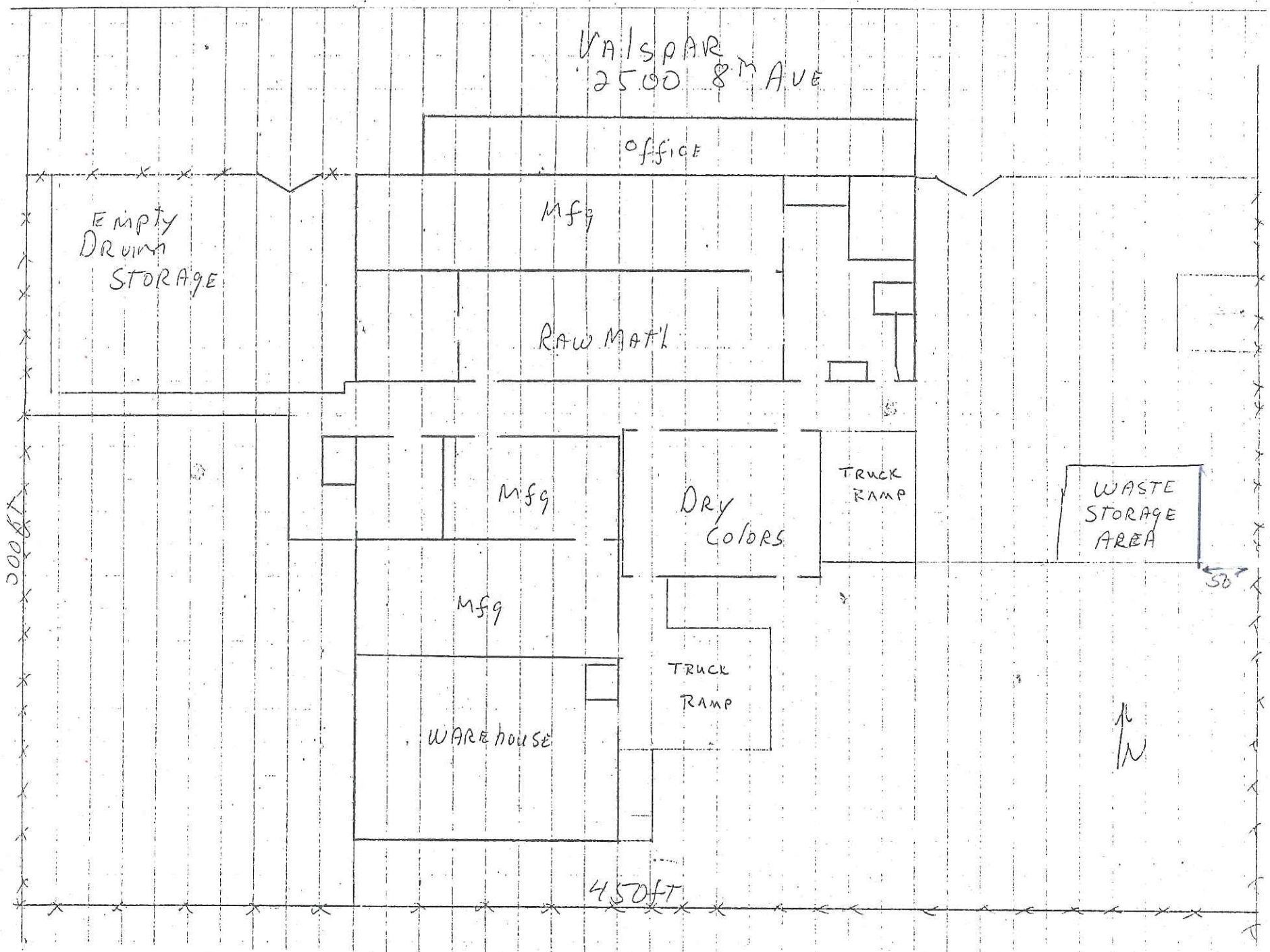
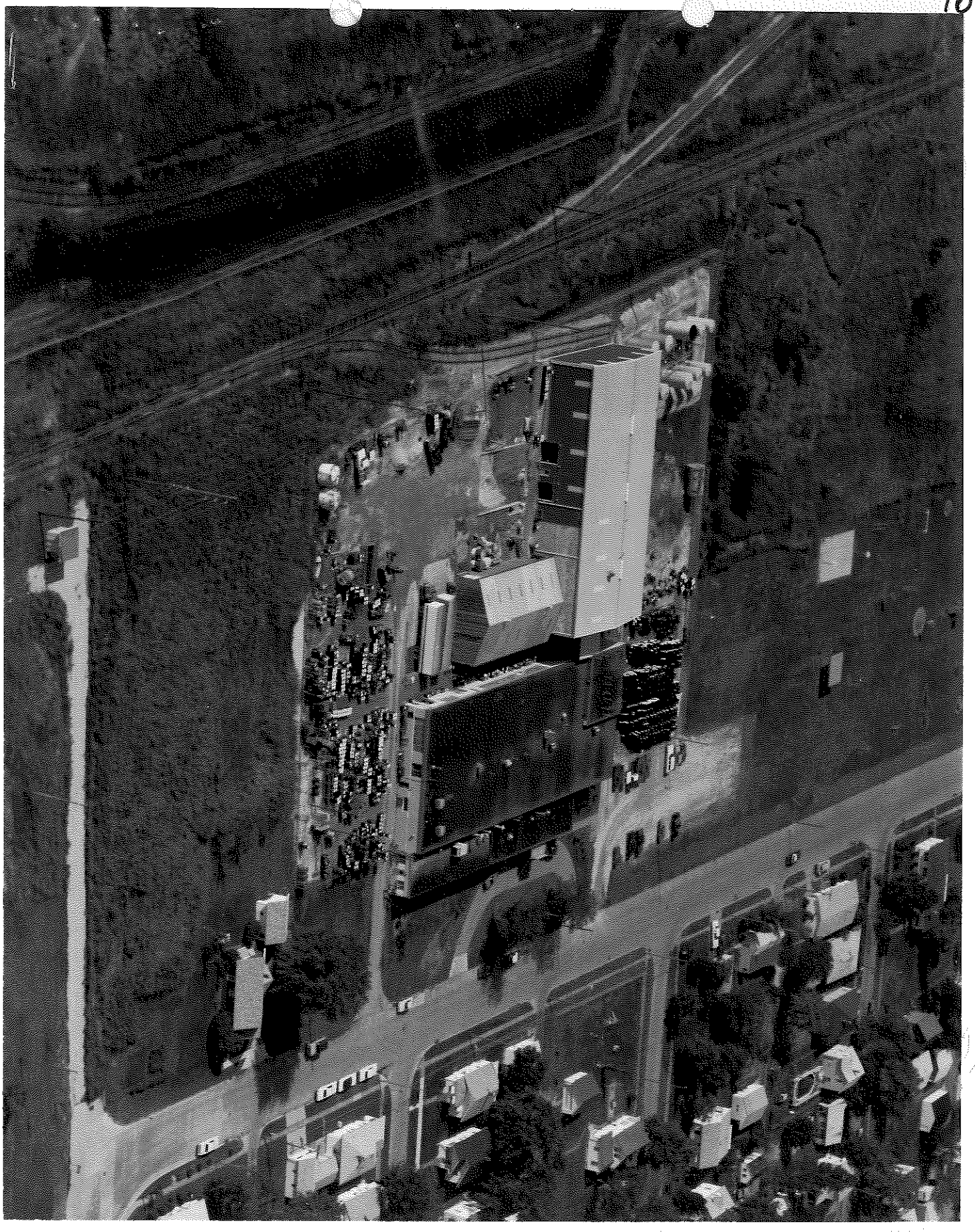
FACILITY DRAWING *(see page 4)*



ILD052437506


VAILSPAR
2500 8TH AVE
office
Mfg
EMPTY
DRUM
STORAGE
RAW MAT'L
Mfg
DRY
COLORS
TRUCK
RAMP
WASTE
STORAGE
AREA
50'
Mfg
TRUCK
RAMP
WAREHOUSE
N
300FT
450FT



The Valspar Corporation
1101 Third Street South/Minneapolis, MN 55415
Mailing Address: P.O. Box 1461/Minneapolis, MN 55440
612/332-7371

June 24, 1985

Illinois Environmental Protection Agency
Division of Land Pollution Control
Permit Section
2200 Churchill Road
Springfield, IL 62706

The Valspar Corporation
East Moline, Illinois - EPA ID #ILD 052 437 506 G,TSD,PA
Withdrawal Part "A" Hazardous Waste Permit Application

Gentlemen:

On November 18, 1980, The Valspar Corporation submitted a RCRA Part "A" Hazardous Waste Permit Application to EPA Region V to obtain interim status as hazardous waste storage facilities for The Valspar Corporation Plant, 2500 Eight Avenue, East Moline, Illinois 61244.

Under normal operating conditions, we find that the ninety (90) day storage and accumulation period is adequate for our needs. Therefore, we wish to withdraw our RCRA Part "A" Hazardous Waste Permit Application and thereby terminate The Vaslpar Corporation, East Moline, Illinois EPA ID # 052 437 506 as hazardous waste storage facility and revert to generator of hazardous waste status.

Enclosed is the Closure Plan and copy of the site RCRA Part "A" for the plant.

The area now used for storage of hazardous waste will continue to be used for the accumulation of waste with the allowable ninety (90) day time period.

If you have any questions, please contact D. A. Grenci at The Valspar Corporation, 20 Johnson Drive, P.O. Box 625, Raritan, New Jersey 08869-0625, (201) 725-8800.

Very Truly Yours,

Herb Denker
Secretary Treasurer

AJE/dlp

cc: Mr. Carl J. Klepitsch
Chief Solid Waste Branch
EPA Region V
320 S. Dearborn Street
Chicago, Illinois 60604

A. J. Espinel
D. A. Grenci
W. Smith - East Moline
J. Whealy

Enclosure: Closure, Post- Closure Plans & Financial Requirements
Copy of Site RCRA Part "A"

Judy Kertcher

Illinois Environmental Protection Agency · P.O. Box 19276, Springfield, IL 62794-9276

217/782-6761

A.4.1

Refer to: 1610250001 -- Rock Island County
The Valspar Corporation
Closure Plan Approved: March 24, 1989
Closure Log #: C-114-M-5
Part A Log #: A-434
ILD052437506
RCRA CLOSURE CERTIFIED # P331398388

January 7, 1991

The Valspar Corporation
Attn: William Smith
2500 8th Avenue
East Moline, Illinois 61244

Dear Mr. Smith:

The subject hazardous waste management facility was inspected by a representative of this Agency on December 12, 1990. The inspection revealed that the closure activity was completed in accordance with the approved closure plan dated March 24, 1989.

Certification that the hazardous waste container storage area had been closed in accordance with the approved closure plan by the owner/operator, The Valspar Corporation, and an independent registered professional engineer, James Michael Burton, of Illinois was received at this Agency October 31, 1990.

The Agency has determined that the closure of the hazardous waste container storage area has apparently met the requirements of Interim Status Standards, 35 Ill. Admin. Code, Part 725 (40 CFR, Part 265). Please note, pursuant to your request, the Agency has withdrawn your facility's Part A permit application.

This facility must continue to meet the requirements of 35 Ill. Adm. Code Part 722: Standards Applicable to Generators of Hazardous Waste.

In accordance with the requirements of 35 IAC 725.243(h), further maintenance of financial assurance mechanisms for this facility is no longer needed.

If you have any questions, please contact Mitchell Smith at 309/693-5462.

Very truly yours,

Glenn D. Savage

Glenn D. Savage, Manager
Field Operations Section
Division of Land Pollution Control

GDS:MTS

cc: Division File
Peoria Region
USEPA Region V, George Hamper
USEPA Region V, Marilyn Sabadaszka
USEPA Region V, Judy Kertcher
James Michael Burton, P.E.
Andy Vollmer
Brian White
Charlie Zeal
Mike Walwer

Mary Murphy

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Log No. C-114-M-2
Received: September 17, 1986

Refer to: 1610250001 -- Rock Island County
Valspar Corporation
ILD052437506
RCRA-Closure

December 12, 1986

The Valspar Corporation
Attention: G. F. Johnston, C.H.C.M.
901 North Greenwood Avenue
Kankakee, Illinois 60901

Dear Mr. Johnston:

This is in response to your letter dated September 16, 1986, and received by this Agency on September 17, 1986, requesting that the closure plan for your drum storage area be modified. In the attached letter you will find an amended list of the conditions to which your closure plan is subject.

The amended conditions differ from those included in the closure plans approved on March 11, 1986, and June 18, 1986, in the following respects:

1. The requirement to test the area with a Photo Ionization Detector or a Flame Ionization Detector has been dropped in favor of testing the soil for Xylene and Mineral Spirits.

2. The slab shall be scrubbed with soap and water and triple rinsed with water. This is considered to be an effective decontamination method; therefore, an analytical demonstration that the slab has been decontaminated will not be required.

3. The soil cleanup levels have been changed from background levels for your site to absolute levels determined by IEPA.

4. Valspar shall submit a Soil Analysis and Remediation Plan, which is described in the attached letter, by March 18, 1986, and certification of closure within 90 days after the Agency approves the plan.

Should you have any questions regarding this matter, please contact Chris Liebman at 217/782-0451.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:CJL:rd0996g/44-45

Attachment

cc: Peoria Subregion of Central Region
Division File - Closure
Financial Assurance Unit
USEPA Region V -- Jim Mayka
USEPA Region V -- Mary Murphy
Compliance Monitoring Section

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Log No. C-114-M-2
Received: September 17, 1986

Refer to: 1610250001 -- Rock Island County
Valspar Corporation
ILD052437506
RCRA-Closure

December 12, 1986

The Valspar Corporation
Attention: G. F. Johnston, C.H.C.M.
901 North Greenwood Avenue
Kankakee, Illinois 60901

Dear Mr. Johnston:

Your letter, dated September 16, 1986, and received by this Agency on September 17, 1986, requesting that the closure plan for the container storage area at the above referenced facility be modified, has been reviewed. The conditions to which the aforementioned closure plan, first approved on March 11, 1986, and previously modified on June 18, 1986, is subject, are hereby amended to consist of the following:

1. The slab shall be scrubbed with a soap and water solution and triple rinsed with water. The wash and rinse waters shall be prevented from draining off the slab, collected and properly disposed. These waters shall be disposed as special waste.

2. After the slab has been decontaminated, the soil shall be sampled in a minimum 4 locations around the perimeter of the slab (i.e. one boring within one foot of each corner). The sampling depths shall be surface to 1 inch and 11 inches to 12 inches.

3. The parameters and cleanup levels listed in the table below shall be used in testing the soil and in demonstrating decontamination.

Metal	EP Tox (mg/l)
Arsenic	0.05
Barium	1.0
Cadmium	0.05
Chromium (total)	1.0
Lead	0.05
Mercury	0.0005
Nickel	1.0
Selenium	0.01
Silver	0.005
Zinc	1.0

Organic	Soil Totals (mg/kg)
Xylene	3.0
Mineral Spirits	50.0

4. Sampling, sample preservation and analytical methods shall be conducted in accordance with Appendices A, B and C of 35 Ill. Adm. Code Part 721.

5. Soil contamination shall be considered to have occurred if levels, for any of the parameters listed in Condition 3 for the samples taken around the storage, exceed "cleanup" levels.

   If the soil is found to have been contaminated, the soil sampling program shall be expanded vertically and laterally, using the method described on pages 4 and 5 of the attached instructions, until the boundaries of contamination are defined. All contaminated soil shall be excavated and disposed as special waste. After excavation, the area shall be sampled and retested to demonstrate that all contaminated soil has been removed. The area shall then be restored to its present contours with clean soil.

6. From the December 11, 1986, telephone conversation between yourself and Chris Liebman of my staff, it is understood that in addition to xylene and mineral spirits other organic solvent wastes were stored in this unit and that the soil has already been tested for the metals listed in Condition 3. To incorporate this information into the closure plan, Valspar shall prepare a Soil Analysis and Remediation Plan which shall include:

   A. A list of all hazardous wastes stored in this unit.

   B. The results of the soil analysis done up to this time, including sample locations.

   The plan may also propose:

   A. The additional parameters for which the soil shall be tested based on all hazardous wastes stored in the unit.

   B. Sample locations.

   C. Cleanup levels for the additional parameters.

   D. Decontamination methods and remedial actions in lieu of or in addition to those required by special condition 5 above.

The Soil Analysis and Remediation Plan shall be submitted to this Agency by March 18, 1986 for approval.

7. This facility must continue to meet the applicable requirements of 35 IAC Part 722 - Standards Applicable to Generators of Hazardous Waste and Part 723 - Standards Applicable to Transporters of Hazardous Waste.

8. The "Certification Regarding Potential Releases from Solid Waste Management Units" which you submitted is being forwarded to the USEPA for possible future action. The approval of this closure plan neither approves nor disapproves of the aforementioned "Certification".

9. Along with your certification of closure, please submit a letter requesting withdrawal of your facility's Part A application.

10. When closure is complete the owner or operator must submit to the Director certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within 90 days after approval by this Agency of your Soil Analysis and Remediation Plan.

    The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126.

    Also along with closure certification, to document the closure activities at your facility, please submit a Closure Documentation Report which includes:

    a. The volume of waste (this includes waste residues, i.e. excavated soil and water from decontaminating the slab) removed.

    b. A description of the method of waste handling and transport.

    c. The waste manifest numbers.

    d. A description of the sampling and analytical methods used.

    e. A chronological summary of closure activities and the cost involved.

    f. Photo documentation of closure.

All certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control -- #24
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

Should you have any questions regarding this matter, please contact Chris Liebman at 217/782-6762.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:CJL:rd0996g/64-67

Attachment

cc: Peoria Subregion of Central Region
Division File - Closure
Financial Assurance Unit
USEPA Region V -- Jim Mayka
USEPA Region V -- Mary Murphy
Compliance Monitoring Section

ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. At least one copy of the certification must contain the original signatures.

Closure Certification Statement

The hazardous waste management unit at the facility described in this document has been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number

Facility Name

Signature of Owner/Operator

Name and Title

Signature of Registered P.E.

Name of Registered P.E. and Registration Number

Date

CJL:rd0996g/68

The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244
(309) 752-1450

August 14, 1985

Illinois Environmental Protection Agency
Division of Land Pollution Control
Permit Section
2200 Churchill Road
Springfield, Illinois 62706

Withdrawal of RCRA - Part "A" Application
EPA ID #ILD 052-437-506
Certification of Closure

ILD052437506 G, TSD, PA

Dear Sir:

I certify that all plant hazardous waste storage facilities have been closed in compliance with Part 725 Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities, Subpart G: Closure and Post Closure Sections 725.211-725.215 of the Illinois Hazardous Waste Rules applicable to our situation.

The facilities previously used for storage of hazardous waste are now used for accumulation. All waste now being accumulated is disposed off-site at approved TSD facilities within the allowable ninety (90) day limitation, Section 722.134 of the Illinois Hazardous Waste Rules.

A copy of the Certification of Closure by a registered professional engineer is enclosed.

Very truly yours,

William A. Smith IV

W. A. Smith IV
Plant Manager

cc: Mr. Carl J. Klepitsch
Chief Solid Waste Branch
EPA Region V
320 S. Dearborn Street
Chicago, Illinois 60604

A. J. Espinel
D. A. Grenci
J. Whealy

WAS:sc

Beling Consultants

August 9, 1985

Mr. Richard Lynch
Valspar Corporation
2500 - 8th Avenue
East Moline, Illinois 61244

Subject: Valspar Corporation
East Moline, Illinois
EPA ID #ILD 052 437 506
Hazardous Waste Closure Certification
Our File 20479-B-10,691-4

Dear Mr. Lynch:

Beling Consultants conducted an on-site inspection for compliance with a closure plan dated June 24, 1985, submitted to IEPA. The on-site inspection was conducted on August 9, 1985, by Robert J. Schaffer, Jr., P.E.

The on-site inspection of the June 24, 1985 closure plan revealed that all items of the closure plan have been completed and adhered to.

Based on the above on-site inspection, this letter will serve to confirm compliance of all items of the closure plan.

Very truly yours,

BELING CONSULTANTS, INC.

Robert J. Schaffer, Jr., P.E.
Illinois License #36592

plf

Log C-114 P731917968

Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RECEIVED JUL 18 1985

JUL 26 1985

SWB-A/S
U.S. EPA, REGION V

Valspar Corp.
2500 8th Avenue
East Moline, IL 61244

Re: Closure Plan Review
Facility Name: East Moline/Valspar
U.S. EPA ID #: ILD052437506 (S, TSD, PA)

Dear Gentlemen;

As you are aware, we are currently evaluating the request for closure of your facility as referenced above, and which is regulated under the Resource Conservation and Recovery Act (RCRA).

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to amend RCRA. Under Section 206 and Section 233 (copies enclosed) of the Amendments, all facilities "seeking a permit" (taken to mean interim status facilities) must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the Unit. Please note that both hazardous and non-hazardous wastes can meet the definition of solid waste under 40 CFR 261.2.

Consequently, we must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that any necessary corrective actions either have been taken, or will be taken, pursuant to a decision on your closure plan. An important part of our determination includes your willingness (or unwillingness) to complete the enclosed certification form. Please read it carefully, complete it, and either sign and return it, or return it to us unsigned with a cover letter of explanation, within 30 days of the date of this letter. Public notice of your request for closure approval, and this request, will be in a newspaper of general circulation in the area of the facility.

Please call Chris Liebman at (217)782-6762 if you have any questions, or wish to discuss this matter further.

Very truly yours,

Lawrence W. Eastep

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:bls/1378E,36

Enclosures

cc: David A. Stringham, U.S. EPA-Region V ✓
Permit Section
File

Beling Consultants

August 9, 1985

Mr. Richard Lynch
Valspar Corporation
2500 - 8th Avenue
East Moline, Illinois 61244

Subject: Valspar Corporation
East Moline, Illinois
EPA ID #ILD 052 437 506
Hazardous Waste Closure Certification
Our File 20479-B-10,691-4

Dear Mr. Lynch:

Beling Consultants conducted an on-site inspection for compliance with a closure plan dated June 24, 1985, submitted to IEPA. The on-site inspection was conducted on August 9, 1985, by Robert J. Schaffer, Jr., P.E.

The on-site inspection of the June 24, 1985 closure plan revealed that all items of the closure plan have been completed and adhered to.

Based on the above on-site inspection, this letter will serve to confirm compliance of all items of the closure plan.

Very truly yours,

BELING CONSULTANTS, INC.

Robert J. Schaffer, Jr., P.E.
Illinois License #36592

plf

CLOSURE PLAN

Name of Site: The Valspar Corporation

Site Location: East Moline, Illinois 61244

Street, R.R. # or P.O. Box 2500 Eight Avenue

City East Moline State Illinois Zip Code 61244

Name of Owner: The Valspar Corporation

Address: 1101 Third Street South

Street, R.R. # or P. O. Box

City Minneapolis State Minnesota Zip Code 55415

Contact Name: William A. Smith

phone number (309) 752-1450

IEPA I.D. No. ILD 052 437 506 IEPA Site No. 161 025 001

Closure shall be: ☒ Complete ☐ Partial (check one)

1. Attach the Part A for this facility and a map diagram or picture showing the facility lay-out and the area(s) to be closed.
2. State the reason of closure.

   Withdrawal of RCRA Part "A" Hazardous Waste Permit Application to terminate interim status as a hazardous waste storage facility and revert to Generator of Hazardous Waste status.

3. Provide an estimate of the maximum inventory of waste in storage during the life of the facility. Include a list of hazardous wastes, their codes, and amount in storage at the time of closure.

1. Maximum inventory of waste in storage during the life of the facility was 750 drums.

2. At closure:
   a. Spent solvent (xylene and mineral spirits) D001 - 80 drums.
   b. Spent Caustic Solution (sodium hydroxide) D002 - 80 drums.

4. Provide a schedule of closure that briefly describes how and when the facility will be closed.

   The Valspar Corporation, East Moline, IL. Plant - SIC 2851 - Paints, varnishes, lacquers, enamels and allied products will continue to operate and generate hazardous waste which will be accumulated in the designated area now used for hazardous waste storage. Closure of the hazardous waste storage area can be accomplished in a relatively short period of time by disposal of all waste off-site at a permitted facility.

   The schedule of closure is as follows:
   1. Notification to Illinois EPA 180 days prior to closure.
   2. On approval of closure plan by Illinois EPA remove and dispose of all waste off-site in the storage facility off-site within 60 day period.

3. The concrete surface storage area will be cleaned and cleaning waste disposed within 30 days after disposal off-site of stored waste.

4. Send Certification Closure by Valspar and professional engineer within 30 days.

5. Total closure time 270 - 300 days.

5. Describe the steps taken at the time of closure to remove hazardous waste residues from the tank(s), its' discharge control equipment and discharge confinement structures.

No hazardous waste storage in tanks.

6. Describe the steps taken to remove containers, liners, base and soil containing or contaminated with hazardous waste.

Container storage is on a concrete surface which can be readily cleaned to remove any residues soon after the drums containing hazardous waste have been sent off-site for disposal at a permitted facility. All waste generated from cleaning will be disposed off-site at an approved TSD facility.

Certification: The undersigned hereby makes an application for a Closure Plan approval and certifies that the information referenced herein is true, correct and current.

THE VALSPAR CORPORATION

Signature of Operator

Herb Denker

Name

1101 So. 3rd St. Mpls MN 55415

Address

THE VALSPAR CORPORATION

Signature of Owner

Herb Denker

Name

1101 So. 3rd St. Mpls MN 55415

Address

I CLOSURE, POST-CLOSURE PLANS AND FINANCIAL REQUIREMENTS

I-1 CLOSURE PLANS

I-1a CLOSURE PERFORMANCE STANDARD

Valspar will close the storage area in a manner that:

1) Minimizes the need for further maintenance and,
2) Controls, minimizes or eliminates to the extent necessary to prevent threats to human health and the environment post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall or waste decomposition products to the ground or surface waters or to the atmosphere.

I-1b MAXIMUM WASTE INVENTORY

The maximum amount of waste for which the hazardous waste storage area at the Moline Valspar plant is designed is 100 drums. Valspar's wastes are coded D-001, D-002 & D-008.

I-1c DISPOSAL OR DECONTAMINATION OF EQUIPMENT

Any facility equipment or structures that have residues of Valspar's wastes are not expected to be hazardous waste. Any ignitible waste spills will be cleaned up in accordance with the spill plan. The residues remaining would not be hazardous because the flammable solvents would have evaporated leaving a thin solid coating which is no longer ignitible; therefore, decontamination of equipment will not be necessary. Any caustic waste residue will be neutralized and removed leaving no caustic residues. Any lead containing liquids will also be cleaned and removed. The remaining residue would be a dry paint film which is not hazardous.

The disposal of such equipment or structures would be subject to Subtitle D as non-hazardous solid waste.

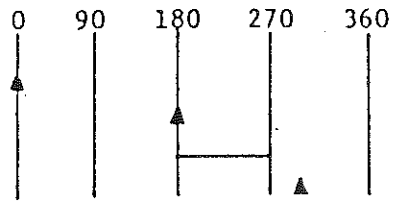
I-1d(1) CLOSURE OF CONTAINERS

Closure of this site will consist of 4 steps:

1. Notification to Regional Administrator at least 180 days prior to the date that closure is expected to begin.
2. Determination of a date for receipt of final inventory.
3. Removal and disposal of final waste inventory within 90 days of the above date.
4. Certification to the regional Administrator by both Valspar and an independent registered professional engineer that the facility has been closed in accordance with the closure plan.

I-1e SCHEDULE FOR CLOSURE

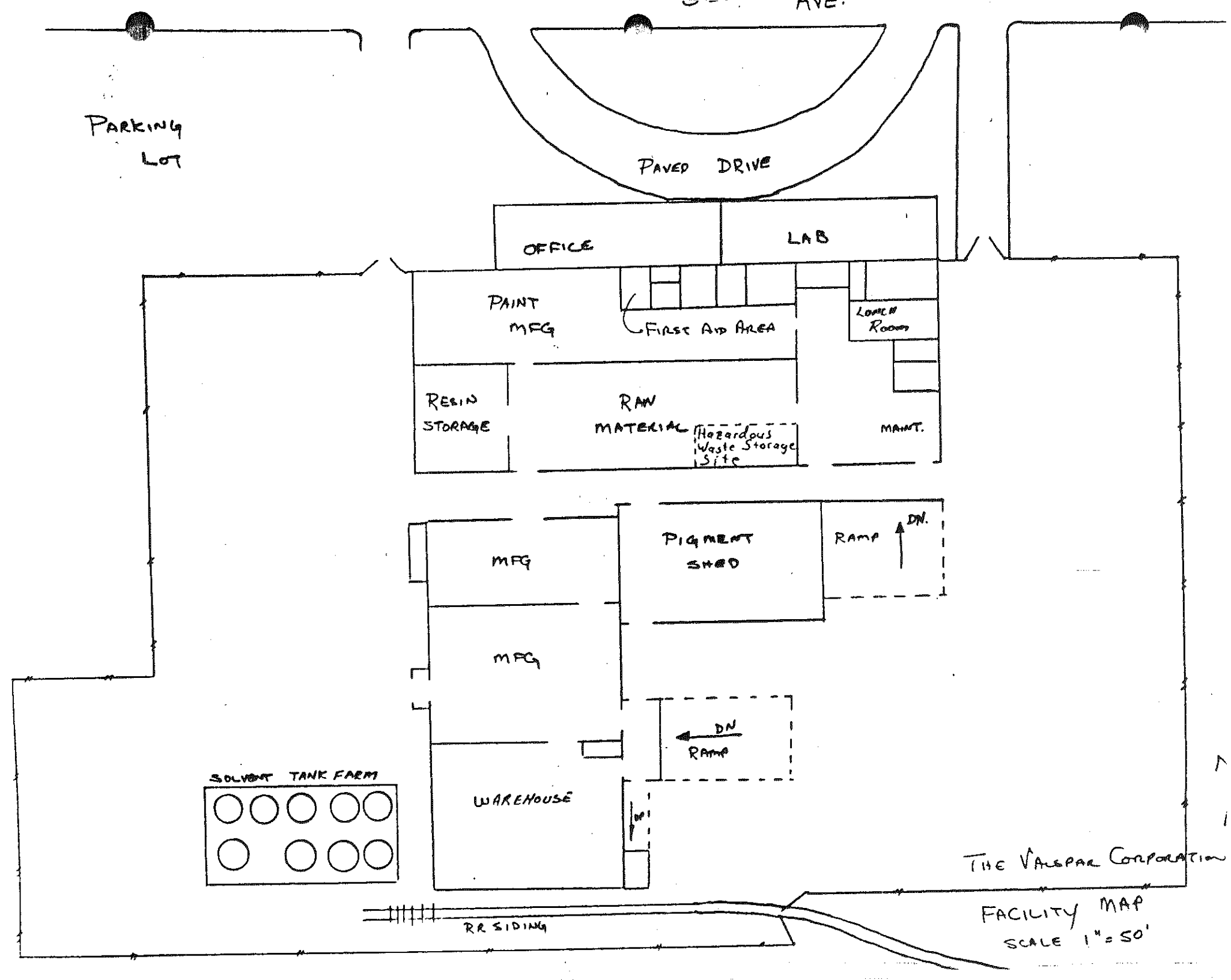
DAYS



1. Notification (180 days)
2. Receipt of Final Inv.
3. Removal & disposal (90 days)
4. Certification (30 days)

I-4 CLOSURE COST ESTIMATES

1.	Notification		-0-
2.	Receipt of Final Inv.		-0-
3.	Removal & Disposal of Drums		
	a. Labor & Load Waste		$ 3500
	b. Disposal & Transportation	2 loads	11629
	c. Decontamination		400
4.	Certification		
	a. P.E. 20 Hrs @ $60/Hr		1200
	Subtotal		$16729
	Administration Cost		2008
	Total Closure Costs		$18737


PARKING LOT
PAVED DRIVE
OFFICE
LAB
PAINT MFG
FIRST AID AREA
LOCKER ROOM
RESIN STORAGE
RAW MATERIAL
Hazardous Waste Storage Site
MAINT.
MFG
PIGMENT SHED
RAMP
DN.
MFG
DN
RAMP
WAREHOUSE
UP
SOLVENT TANK FARM
RR SIDING
THE VALSPAR CORPORATION
FACILITY MAP
SCALE 1" = 50'

B. Permit Application
/Post Permit

USEPA

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601

GEORGE H. RYAN, GOVERNOR RENEE CIPRIANO, DIRECTOR

217/524-3300

November 22, 2002

CERTIFIED MAIL
7001 2510 0002 3279 9097

Timberline Pallet and Skid, Inc.
Attn: Joe Tindell
P.O. Box 631
East Moline, Illinois 61244-0631

Re: 1610250001--Rock Island County
Valspar Corp
ILD052437506
RCRA Administrative Record File

Dear Mr. Tindell:

This letter is to inform you that the Illinois EPA has withdrawn the above referenced application as requested by Gary Perkowitz of Clayton Group Services in a letter dated October 17, 2002 and received by the Illinois EPA on October 21, 2002. The permit application contains a request for a Remedial Action Plan Permit.

The application is being kept in our files.

If you have any questions, please contact Sean Chisek at 217/524-3867.

Sincerely,

Joyce L. Munie, P.E.
Manager, Permit Section
Bureau of Land

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SCC, 2977

cc: Gary Perkowitz, Clayton Group Services
Allen Stegman, Valspar Coatings
Greg Czajkowski, U.S. EPA - Region V

H Croke

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

217/524-3300

July 24, 2001

CERTIFIED MAIL
7099 3400 0002 1429 6619
7099 3400 0002 1429 6640

Timberline Pallet and Skid, Inc.
Attn: Joe Tindell
P.O. Box 631
East Moline, Illinois 61244-0631

Valspar Coatings
Attn: Allen Stegman
701 South Shiloh Road
Garland, Texas 75042

Re: 1610250001 -- Rock Island County
Valspar Corp.
ILD052437506
RCRA Administrative Record File

Gentlemen:

Enclosed is a draft RCRA Remedial Action Plan Permit (RAPP) and fact sheet for the former Valspar Coatings site. The RAPP would allow Timberline Pallet and Skid, Inc. and Valspar Coatings to pile hazardous remediation waste in a staging pile and treat the waste in a miscellaneous unit at the site.

If you have comments on the draft permit, please submit them to the Illinois EPA by September 17, 2001, to the address below.

Illinois EPA
Bureau of Land, Permit Section
Attn: Sean Chisek (#24)
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

If you have any questions regarding the enclosed draft permit or fact sheet, please contact Sean Chisek, P.E. of my staff at 217/524-3867.

Sincerely,

Joyce L. Munie by SP

Joyce Munie, P.E.
Manager, Permit Section
Bureau of Land

JLM:SCC:bjh\1743s.doc

Enclosures: Fact Sheet
Draft Remedial Action Plan Permit

cc: John Rohr, P.E., Clayton Group Services
Allen Stegman, Valspar Coatings
Harriet Croke, U.S. EPA -- Region V

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

217/524-3300

RCRA REMEDIAL ACTION PLAN PERMIT

1610250001--Rock Island County
Valspar Corp
ILD052437506
RCRA Administrative Record File

Permit No. B-183
Date Issued:
Effective Date:
Expiration Date:

DRAFT

Timberline Pallet and Skid, Inc.
Attn: Joe Tindell
P.O. Box 631
East Moline, Illinois 61244-0631

Valspar Coatings
Attn: Allen Stegman
701 South Shiloh Road
Garland, Texas 75042

Gentlemen:

A Remedial Action Plan Permit (RAPP) is granted to Timberline Pallet and Skid, Inc. as owner and Valspar Coatings as operator to construct and operate the hazardous remediation waste management units described below.

Hazardous remediation waste, consisting of soil may be placed in a staging pile prior to treatment in an indirect heat volatilization unit. The indirect heat volatilization unit is considered a miscellaneous unit under 35 Ill. Adm. Code 724, Subpart X. The contaminated soil is considered to be a listed hazardous waste for toluene (U220). The goal of the treatment is to treat the soil to below the Tiered Approach to Corrective Action (TACO), Tier 1 residential clean-up objectives. After treatment, the soil will be moved to two treated soil staging areas, where the soil will be kept pending the results of laboratory analysis. If lab analysis indicates the soil meets the clean-up objective for toluene, the soil will no longer be considered a listed hazardous waste.

This permit is issued pursuant to Section 39(d) of the Illinois Environmental Protection Act and 35 Ill. Adm. Code. The Permittee shall comply with all terms and conditions of this permit and the applicable regulations contained in 35 Ill. Adm. Code Parts 703, 724, and 728. This RAPP is issued based on information submitted by the Permittee. Any inaccuracies found in the permit application may be grounds for termination or modification of this permit, and potential enforcement action.

The permit application approved by this permit consists of the documents listed below.

DOCUMENT	DATED	RECEIVED
Permit Application, Log No. B-183	June 4, 2001	June 5, 2001

DRAFT

This permit is issued subject to the following special conditions and the attached standard conditions.

1. The Permittee shall construct and operate a staging pile in accordance with the plans and specifications contained in the RAPP application.

2. At the end of each day of operation, the staging pile shall be covered with tarpaulins or plastic sheeting. The tarpaulins and plastic sheeting shall be secured with sand bags or other weighted objects.

3. During operation of the staging pile, the Permittee shall conduct air monitoring and, if needed, abatement activities in accordance with the RAPP application.

4. After treatment in the indirect heat volatilization unit, the soil shall be placed in one of two treated soil staging areas, shown on Figure 4 of the approved permit application.

5. One sample of treated soil shall be taken for each batch of soil processed (approximately 64 cubic yards or 100 tons). At a minimum, samples shall be analyzed for toluene, ethylbenzene, and total xylenes.

6. If the treated soil meets the clean up objective listed below, the soil will no longer be considered a hazardous waste. The clean up objective listed below is to be used only to determine if the soil is considered a listed hazardous waste.

CONSTITUENT	CLEAN UP OBJECTIVE ($^{mg}/_{kg}$)
Toluene	12

7. If the treated soil meets the clean up objective listed below, the treated soil may be used on-site as fill.

CONSTITUENT	CLEAN UP OBJECTIVE ($^{mg}/_{kg}$)
Xylene (total)	410
Toluene	12

8. All waste shall be removed from the staging pile prior to permit expiration.

9. The Permittee shall close the staging pile and secondary containment area in accordance with 35 Ill. Adm. Code 724.211 and the approved closure plan. At a minimum, this includes: sweeping and power washing the secondary containment area, decontaminating the equipment used at the site, decontaminating the indirect heat volatilization unit, and disposal of plastic sheeting.

DRAFT

10. The current closure cost estimate for closure of the staging pile is $4000.00. Pursuant to 35 Ill. Adm. Code 724.251, the Permittee shall maintain financial assurance for the amount of the approved closure cost estimate ($4000.00), and the applicable liability requirements.

11. Pursuant to 35 Ill. Adm. Code 724.654, within 180 days of removing the final volume of waste from the staging pile, the Permittee shall submit to the Illinois EPA, a certification that the staging pile has been closed in accordance with the approved closure plan. The attached closure certification statement must be used. An independent Illinois registered professional engineer shall certify that the closure requirements of 35 Ill. Adm. Code 724.211, and the closure requirements of the approved closure plan have been met.

Within 35 days after the notification of the final permit decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA. However, the 35 day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice provided to the Board from the applicant and the Illinois EPA within the 35 day initial appeal period.

Work required by this permit, your application, or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Engineering Practice Act of 1989, the Professional Land Surveyor Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This permit does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

If you have any questions regarding this permit, please contact Sean Chisek, P.E. at 217/524-3867.

Sincerely,

DRAFT

Joyce Munie, P.E.
Manager, Permit Section
Bureau of Land

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Attachments: Standard Conditions for Remedial Action Plan Permits (RAPPs)
Closure Certification Statement

STANDARD CONDITIONS FOR REMEDIAL ACTION PLAN PERMITS (RAPPs)

1. Pursuant to 35 IAC 702.181, the existence of a RAPP shall not constitute a defense to a violation of the Environmental Protection Act or applicable regulations. Issuance of this permit does not convey property rights or any exclusive privilege. Issuance of this permit does not authorize any injury to property or invasion of other private rights, or infringement of state or local law or regulations.

2. Pursuant to 35 IAC 702.141, the Permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Illinois Environmental Protection Act and is grounds for enforcement action, permit revocation or modification, or denial of a permit renewal application.

3. Any claim of confidentiality must be asserted in accordance with 35 IAC 703.302(e) and 35 IAC 120.

4. This permit is not transferrable to any person or corporation unless the transfer is approved in writing by the Illinois EPA. All permit transfers shall be conducted in accordance with 35 IAC 703.305(c).

5. Pursuant to 35 IAC 702.152(h), if the Permittee becomes aware that they failed to submit relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Illinois EPA, the Permittee shall promptly submit such facts or information to the Illinois EPA.

6. This RAPP may be appealed in accordance with the provisions contained in 35 IAC 703.303(f).

7. This RAPP is approved pursuant to 35 IAC 703 and 724. The issuance of this RAPP does not constitute approval of any remediation plan or cleanup objective under 35 IAC 740 or 742.

8. If the Permittee wishes to modify the RAPP, the Permittee shall send an application for permit modification to the address below.

   Illinois Environmental Protection Agency
   Bureau of Land
   1021 North Grand Avenue East
   P.O. Box 19276
   Springfield, Illinois 62794-9276

   DRAFT

   The Permittee shall submit the RCRA Remedial Action Plan (RAP) Application form and a detailed description of the requested modification. If the Illinois EPA believes the requested change(s) would significantly change the management of remediation waste, the Illinois EPA shall comply with the draft RAPP and public notice requirements of 35 IAC 703.303(d). The certification of closure, if approved, shall not be considered a significant change requiring public notice under 35 IAC 703.303(d).

9. Pursuant to 35 IAC 702.149, the Permittee shall allow an authorized representative of the Illinois EPA, upon the presentation of credentials and other documents as may be required by law, to:

   a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

   b. Have access to an copy, at reasonable times, any records that must be kept under the conditions of this permit;

   c. Inspect at reasonable times any facilities, equipment, practices, or operations regulated or required by this permit;

   d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the appropriate Act, any substances or parameters at any location.

10. All permit applications, reports, or information submitted to the Illinois EPA, in regards to the RAPP shall be signed and certified in accordance with 35 IAC 702.126.

11. The Permittee shall comply with the security provisions of 35 IAC 724.101(j)(3), and the emergency coordinator requirements of 35 IAC 724.101(j)(ii).

12. Pursuant to 35 IAC 724.101(j)(4), the Permittee shall inspect the remediation waste management site for malfunctions, deterioration, operator error, and discharges that may be causing or may lead to a release of hazardous waste constituents to the environment or a threat to human health. Inspections shall be conducted often enough (at least once each operating day) to identify problems in time to correct them before they harm human health or the environment. If a hazard has already occurred, the Permittee shall immediately take remedial action to minimize impacts on human health and the environment. Within 30 days of any releases, the Permittee shall submit to the Illinois EPA, a description of the release and a description of any corrective measures taken.

13. If waste is taken off-site for treatment or disposal, the Permittee shall comply with the land disposal restrictions contained in 35 IAC, Part 728.

14. If hazardous waste is shipped off-site, the Permittee shall comply with the manifest, pre-transport, and reporting and record keeping requirements of 35 IAC 722, Subparts B, C, and D. If non-hazardous special waste is shipped off-site, the Permittee shall comply with the manifest requirements of 35 IAC 808.121 and 808.122. In either case, a transporter licensed in accordance with 35 IAC, Section 809 must be used when transporting hazardous or non-hazardous special waste.

15. If the Permittee wishes to renew this permit, the Permittee shall follow the process for application and issuance of RAPPs found in 35 IAC 703, Subpart H. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must apply for a new permit at least 30 days before this permit expires, unless permission for a later date has been granted by the Illinois EPA. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a renewal application at least 30 days before this permit expires, and through no fault of the Permittee, the Illinois EPA has not issued a new permit.

16. Pursuant to 35 IAC 703.305(a), the Permittee shall maintain all data used to complete the RAP application, and any supplemental information the Permittee submits to the Illinois EPA, for a period of at least three years from the date the original RAP application is signed. This information shall be made available to representatives of the Illinois EPA upon request.

17. Pursuant to 35 IAC 724.101(j)(13), the Permittee shall maintain records documenting compliance with 35 IAC 724.101(j)(1) through (12) at the facility.

18. The Permittee shall demonstrate compliance with 35 IAC 724, Subpart H by providing documentation of financial assurance, as required by 35 IAC 724.251, in at least the amount of the approved closure cost estimate and the applicable liability requirements. Changes in financial assurance mechanisms must be approved by the Illinois EPA in accordance with 35 IAC 724.243. The Permittee shall comply with 35 IAC 724.248 whenever necessary.

DRAFT

CLOSURE CERTIFICATION STATEMENT
Valspar Corp.
Closure Log No. B-183

To meet the requirements of 35 Ill. Adm. Code 724.215, this statement is to be completed by both a responsible officer of the owner/operator (as defined in 35 Ill. Adm. Code 702.126) and by an independent licensed professional engineer upon completion of closure. Submit one copy of the certification with original signatures and two additional copies.

The hazardous waste staging pile, as described in Permit Application, Log No. B-183 has been closed in accordance with the specifications in the approved closure plan. A report documenting that closure has been carried out in accordance with the approved plan is attached.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number	Facility Name
Signature of Owner/Operator Responsible Officer Date	Name and Title of Owner/Operator Responsible Officer
Signature of Licensed P.E. Date	Name of Licensed P.E. and Illinois License Number
Mailing Address of P.E.:	Licensed P.E.'s Seal:

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FACT SHEET
DRAFT REMEDIAL ACTION PLAN PERMIT (RAPP)
1610250001--Rock Island County
Timberline Pallet and Skid, Inc. (formerly Valspar Chemical Coatings)
ILD052437506

This fact sheet has been prepared pursuant to the requirements of Title 35 Illinois Administrative Code (Ill. Adm. Code) Section 703.303(b). This fact sheet is intended to be a brief summary of the principal facts and significant factual, legal, methodological and policy questions considered in preparing a draft RAPP. If issued, the RAPP will allow Timberline Pallet and Skid, Inc. (Timberline) and Valspar Coatings (Valspar) to remediate hazardous waste-contaminated soils on property currently owned by Timberline. This property was formerly owned and operated by Valspar. The permit would allow Timberline and Valspar to temporarily pile excavated contaminated soil in an on-site staging pile, treat the excavated soil in an indirect heat volatilization steam injection (IHV) unit, and to temporarily place treated soil in an on-site treated soil pile for confirmation sampling before being replaced in the excavation. This fact sheet is not intended to be a summary of remediation activities that have occurred, or will occur, at the Timberline site.

I. GENERAL FACILITY DESCRIPTION

The Timberline site is located at 2500 8th Avenue, East Moline, Illinois 61244 (Latitude and Longitude: N41°31'33" W90°25'07"). Its mailing address and phone number are:

Timberline Pallet and Skid, Inc.
P.O. Box 631
East Moline, Illinois 61244-0631
309/752-1770

The site was operated as a paint and varnish manufacturing facility between 1957 and 1991. The Valspar Corporation owned and operated the facility from 1970 to 1994. In June 1991, paint and varnish production operations ceased and the facility was idle until Timberline purchased the property in May 1994. Timberline currently uses the facility to manufacture wood pallets and custom shipping crates.

In the past, an aboveground storage tank farm was located in the southwest portion of the industrial site. Solvents stored in the former tank farm include xylol, Aromatic 100, Aromatic 150, toluol, methyl ethyl ketone, VM & P Naphtha, and mineral spirits. As part of a site investigation, soil samples were taken from the former tank farm area. Toluene, ethylbenzene, and xylene were detected in the soil at concentrations that exceeded the site remediation objectives. In its current state, the soil must be managed as a hazardous waste due to toluene contamination. The applicants estimate approximately 1200 tons of soil must be excavated and treated as hazardous waste.

If issued, the RAPP will allow Timberline and Valspar to excavate the contaminated soil, place it in a staging pile, and then treat it in indirect heat volatilization (IHV) unit. The RAPP is limited to these hazardous waste management activities. It does not address the level of site investigation, development of remediation objectives, nor the scope of the remediation performed at the site. These activities will be reviewed separately by the Illinois EPA's Site Remediation Program.

The staging pile, used to manage the contaminated soil prior to treating it, will be constructed on a bermed, asphalt pad to prevent the runoff of contaminated soil and, when necessary, covered to prevent rainwater infiltration and control air emissions. While the staging pile is in operation, no more than one day's anticipated treatment volume of soil (approximately 180 tons) will be placed in the staging pile. The total amount of time anticipated for operation of the staging pile and IHV unit will be approximately eight days to two weeks, weather permitting. After Timberline and Valspar are finished using the staging pile, the staging pile will be closed by properly disposing of the plastic material used to line the containment berm, cleaning the asphalt pad and disposing of the plastic sheeting used to cover the staging piles.

The treatment unit will consist of an IHV unit and will also be placed on the bermed asphalt pad. The IHV unit consists of four 16 cubic yard processing vessels. Soil is placed in each vessel. The vessel lid is hydraulically closed and manually sealed. Steam is injected into the soil for 2 to 3 hours. The IHV unit uses a two-step method for remediating the soil. First, as the steam passes through the soil, it fractures the soil, creating a loose matrix. It also volatilizes low boiling point VOCs from the soil and as the temperature of the soil rises, also volatilizes moisture in the soil into steam which flushes the higher boiling point VOCs from the soil. The steam, contaminated with volatile organic chemical compounds from the soil, is carried into primary and secondary condensers. The condensed liquid (contaminated water) is pumped through a particulate matter filters and finally to a series of activated carbon tanks where the VOCs are removed from the condensed water. The contaminated carbon will be sent off site for disposal. This is a closed-loop system with no venting to the atmosphere; once contaminants are captured, the filtered condensed water is reused in the system to generate steam.

After the soil has been treated, it will be moved to one of two treated soil piles also placed on the bermed asphalt pad. The soil will be placed in piles while samples of soil are analyzed to ensure it meets the remediation objectives. If the soil meets the remediation objective for toluene (listed in the draft permit), it will no longer be considered a hazardous waste. If the soil meets the site remediation objectives for toluene and the other contaminants (listed in the draft permit), it will be placed back in the excavated area as fill. If the soil does not meet the remediation objectives, it will be treated again in the IHV unit. If Timberline and Valspar wish to utilize the staging pile for additional volumes of hazardous wastes found during future remedial activities, they must submit a request to modify their RAPP prior to using them.

Attached is a map showing the location of Timberline, and a scale drawing of the Timberline site showing the location of the proposed staging pile and IHV unit.

II. PERMIT TERMS AND CONDITIONS

Attached is a draft RAPP issued to Timberline as owner and to Valspar as operator. The RAPP contains conditions necessary to ensure compliance with 35 Ill. Adm. Code, Parts 703, 724, and 728.

If a final RAPP is issued, the applicants may request a modification of the RAPP by submitting a RCRA Remedial Action Plan Application and a detailed description of the proposed modification. Prior to implementing any modification, Timberline and Valspar must receive written approval from the Illinois EPA. If the applicants wish to renew the RAPP, they must follow the procedures for application and issuance of RAPPs found in 35 Ill. Adm. Code 703, Subpart H. If a final RAPP is issued and Timberline or Valspar fail to comply with any terms or conditions of the permit or their joint RAPP application, the permit may be revoked or modified by the Illinois EPA.

III. PROCEDURES FOR REACHING A FINAL DECISION

Prior to the Illinois EPA reaching a final permit decision, the public is given 45 days to review the permit application and to comment on the draft permit conditions. The comment period will begin on July 30, 2001, and will end on September 17, 2001.

Copies of the permit application, draft permit, and fact sheet are available for review at:

East Moline Public Library
740 16th Ave.
East Moline, IL 61244

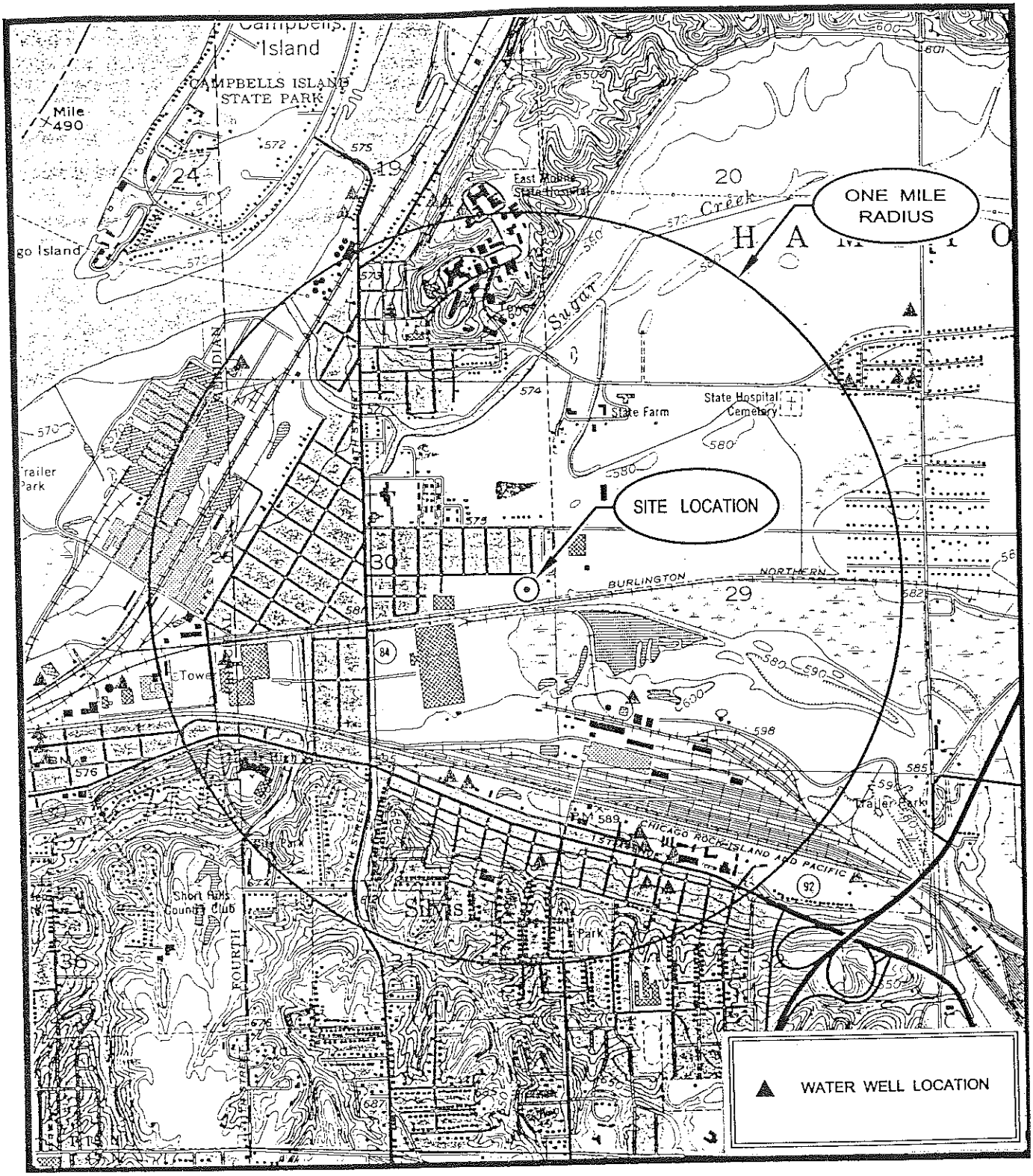
The Illinois EPA's administrative record for the RAPP is available for public inspection by appointment only, at the Illinois EPA's Springfield office from 8:30 a.m. to 5:00 p.m., Monday through Friday. The administrative record contains the permit application, draft permit, fact sheet and other supporting documents and correspondence submitted to the Illinois EPA. Inspection of the administrative record may be scheduled by contacting Mara McGinnis at the telephone number listed below.

For further information regarding the permit process or to submit written comments on the draft permit, please contact:

Mara McGinnis
Office of Community Relations (#33)
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276
217/524-3288

In response to requests received during the comment period or at the discretion of the Illinois EPA, an informal public hearing may be held to clarify one or more issues concerning the permit application. A request for a public hearing must be in writing and must state the nature of the issues proposed to be discussed in the hearing. Public notice will be issued 45 days before any public hearing.

MM\mls\011612s.doc



Scale 1:24000

0 1/2 1 MILE

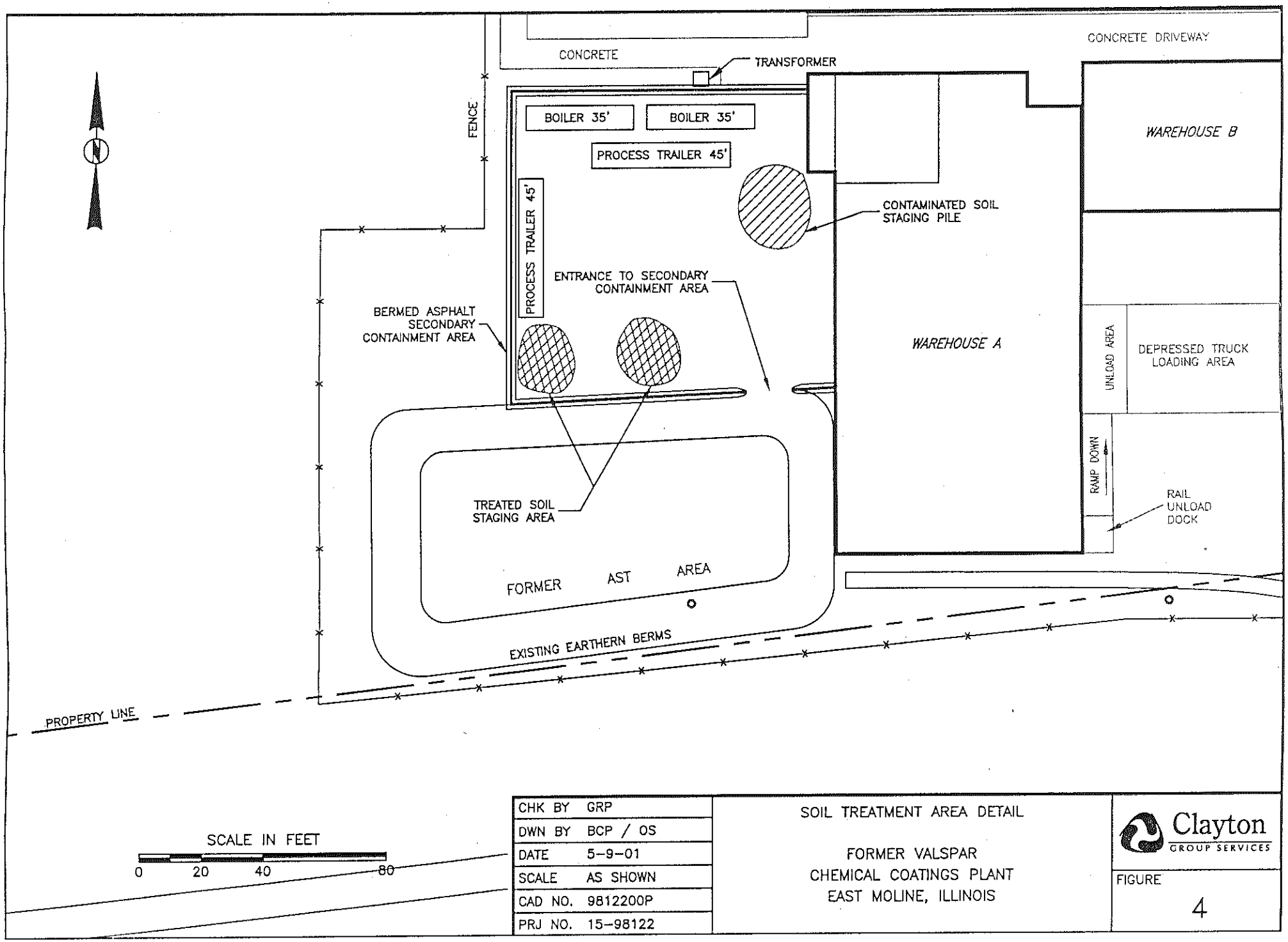
1000 0 1000 2000 3000 FEET

QUADRANGLE LOCATION

FIGURE 1

SITE LOCATION MAP
VALSPAR CORPORATION
2500 EIGHTH AVENUE
EAST MOLINE, ILLINOIS

(SOURCE OF MAP IS USGS 7.5 MINUTE QUADRANGLE MAP, SILVIS, ILLINOIS-IOWA)



CHK BY	GRP
DWN BY	BCP / OS
DATE	5-9-01
SCALE	AS SHOWN
CAD NO.	9812200P
PRJ NO.	15-98122

SOIL TREATMENT AREA DETAIL

FORMER VALSPAR
CHEMICAL COATINGS PLANT
EAST MOLINE, ILLINOIS

Clayton GROUP SERVICES

FIGURE
4

C.2 Compliance/ Enforcement

18 APR 1989

5HR-12

Mr. William Stewart
Valspar Corporation
1101 Third Street South
Minneapolis, Minnesota 55415

Re: Valspar Corporation
ILD 052 437 506

Dear Mr. Stewart:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on March 24, 1989. The stated actions appear to adequately address the land disposal restrictions deficiency outlined in our February 27, 1989, Notice of Violation.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Janet Haff of my staff at (312) 353-7923.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Programs Section

cc: Glen Savage, IEPA, FOS
Harry Chappel, IEPA, CMS

5HR-12:J. JAFF:or:04/14/89:Disk 3:PCFILENAME STEWERT

04/14/89

RCRA ENFORCEMENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE		P.E.D. 4-17-89	

The Valspar Corporation

March 22, 1989

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section
US Environmental Protection Agency
Region 5
230 S. Dearborn Street
Chicago, IL 60604

RE: Notice of Violation
The Valspar Corporation
ILD052437506

Dear Mr. Dimock:

William Smith IV, Plant Manager of Valspar's East Moline facility, forwarded your Notice of Violation dated February 27 to me.

I have discussed the apparent violation with Ms. Haff of your office and Mr. Jones of the Illinois EPA. Mr. Jones did not see a copy of the land disposal restrictions notification when he visited us November 15, 1988.

I am attaching a copy of the notification and the appropriate manifest. This notification is included with each shipment of F003 and F005 waste leaving the site.

Valspar determines the characteristics of our waste solvent by our knowledge of what solvents are used to clean the equipment. This method is in compliance the 40CFR268 section 265.13. I have attached a copy of our sample plan.

If you have any further questions, please call me at 612-375-7973.

Sincerely,

William J Stewart

William J Stewart
Director of Regulatory Affairs

cc: William Smith - East Moline

encl.

s890322a

1101 Third Street South • Minneapolis, MN 55415
P.O. Box 1461 • Minneapolis, MN 55440 • 612/332-7371

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
P.O. Box 7035
Indianapolis, IN 46207-7035

PLEASE PRINT OR TYPE (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: I·L·D·0·5·2·4·3·7·5·0·6
Manifest Document No.: 0·0·0·0·1
2. Page 1 of 1
Information in the shaded areas is not required by Federal law, but items D, F, H and I are required by State law.

3. Generator's Name and Mailing Address
VALSPAR CORPORATION
2500 EIGHTH AVENUE, EAST MOLINE, IL 61244

4. Generator's Phone (309)752-1450

A. State Manifest Document Number: INA 0220857
B. State Generator's ID:

5. Transporter 1 Company Name: MR. FRANK
6. Use EPA ID Number: I·L·D·0·6·9·5·0·6·1·6·0
C. State Transporter's ID: 0079
D. Transporter's Phone: 312-596-3377

7. Transporter 2 Company Name:
8. Use EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address
AMERICAN CHEMICAL
420 S. COLFAX
GRIFFIN, IN 46823
10. Use EPA ID Number: I. N. D. 0. 1. 6. 3. 6. 0. 2. 6. 5
G. State Facility's ID: 9180890002
H. Facility's Phone: 312-768-3400

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol.	I. Waste No.
a. WASTE FLAMMABLE LIQUID N.O.S. FLAMMABLE LIQUID UN1993	0·0·1	T·T	05000	G	F003
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
WEAR SAFETY GLASSES AND GLOVES
AVOID BREATHING CONCENTRATED VAPORS

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR — Printed/Typed Name: ROD BROWN — Signature: Rod Brown — Date: Month 1·1 Day 1·5 Year 8·8

TRANSPORTER
17. Transporter 1 Acknowledgement of Receipt of Materials — Printed/Typed Name: GARY DERESS — Signature: Gary Deress — Date: Month 1·1 Day 1·5 Year 8·8
18. Transporter 2 Acknowledgement of Receipt of Materials — Printed/Typed Name: — Signature: — Date: Month · Day · Year ·

FACILITY
19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: F DUNFEE — Signature: F Dunfee — Date: Month 1·1 Day 1·6 Year 8·8

In case of a spill call Indiana Office of Environmental Response at 317/243-5155 (day), or 317/633-0144 (night) and the National Response Center at 800/424-8802 or 202/426-2675.

INA 0220857

EPA Form 8700-22 (Rev. 9-86)
Previous editions are obsolete.
State Form 11865

DISTRIBUTION:
PAGE 1 (white) TSD MAIL TO GENERATOR
PAGE 2 (goldenrod) GENERATOR MAIL TO GENERATOR STATE
PAGE 3 (light green) TSD MAIL TO TSD STATE
PAGE 5 (light blue) TSD COPY
PAGE 6 (canary) GENERATOR COPY
PAGE 7 (white) TRANSPORTER 1 COPY

No. 15393

INDUSTRIAL DISPOSAL
MR. FRANK INC.
21900 S. Central Avenue • Matteson, IL 60443-2802

Date 11/15/88 FED. EPA ID # ILD 069506160 IL TRANSPORTER # 0079

WORK ORDER # _____ PRODUCT CODE # _____ P.O. # _____

SHIPPER (From) VALSPAR CORPORATION

ADDRESS 2500 - 8TH AVE., EAST MOLINE STATE ILLINOIS COUNTY ROCK ISLAND

DESTINATION (To) AMERICAN CHEMICAL SERVICES., INC. MANIFEST # ~~IN~~ 4022085 7

ADDRESS 420 S. COLFAX AVE., GRIFFITH STATE INDIANA COUNTY LAKE

SEALS: FRONT _____ MIDDLE _____ REAR _____ VALVE _____

MC: CODE: 312 _____ 307 XXX OTHER _____

NO OF UNITS	HM	DESCRIPTION AND CLASSIFICATION Proper Shipping Name, Hazard Class and ID Number	QUANTITY
A. 1 1/2	XXX	WASTE FLAMMABLE LIQUID., N.O.S., UN 1993	5000
B.			
C.			

THIS IS TO CERTIFY THAT THE ABOVE NAMED ARTICLES ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION, ALSO SIGNATURE VERIFIES ARRIVAL AND DEPARTURE TIME.

R D Blum / Mission Coord SIGNATURE

SPECIAL COMMENTS Pump drums. Thick material in bottom of drums.

TIME:
LOADING: ARRIVED 9 00 DEPARTED 10 00

UNLOADING: ARRIVED _____ DEPARTED _____

TRUCK# ~~53~~ TRAILER# ~~227~~ DRIVER ~~GARY DEPESS~~

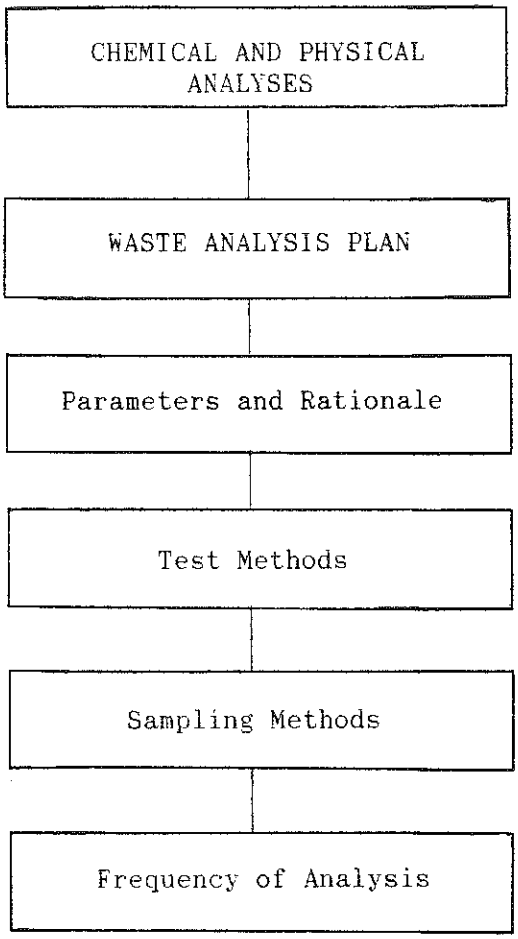
		OUT	IN
Hose:	2"	1	1
	3"	3	3
Pumper	2"	1	1
	3"	—	—
Drum Cart		—	—
3-2		58	58
Load Lock		—	—

COPIES TO: Gold-*Shipper* / Pink-*Disposal Site* / Canary-*Hauler* / White-*Hauler*

LAND DISPOSAL RESTRICTION NOTIFICATION

VALSPAR Corporation hereby notifies AMERICAN Chemical Service that the waste described in Manifest Number 022085 contains F001 F002 (F003) F005 (circle codes) spent solvents listed below. These wastes are subject to the land disposal prohibition with prior treatment to standards contained in 40CFR Part 268.

F001-F005 Spent Solvents	Waste Contains	40CFR Part 268 Subpart D Treatment Standard mg/liter CCWE
acetone	X	0.59
N-butyl alcohol	X	5.00
ethyl acetate		0.75
isobutanol	X	5.00
methanol	X	0.75
methylene chloride	X	0.96
methyl ethyl ketone	X	0.75
methyl isobutyl ketone		0.33
tetrachloroethylene		0.05
toluene	X	0.33
1,1,1-trichloroethane		0.41
1,1,2-trichloro, 1,2,2-trifluoroethane		0.96
trichloroethylene		0.091
trichlorofluoromethane		0.96
xylene	X	0.15



Subject area C - waste characteristics flowchart.

Subject	Regulatory Citation 40 CFR Section Nos.
C. WASTE CHARACTERISTICS	
C-1 Chemical and physical analysis	122.25(a)(2) 264.13(a)
C-2 Waste analysis plan	122.25(a)(3)
C-2a Parameters and rationale	264.13(b) and (c)
C-2b Test methods	261 App. I
C-2c Sampling methods	
C-2d Frequency of analysis	

C. WASTE CHARACTERISTICS

C-1 Chemical & Physical Analysis

- as provided to Trade Waste Incineration

- internal data ie. Physical Characteristics
  check & record

PHYSICAL CHARACTERISTICS
CHECK & RECORD

A. Color _____

B. Odor
   Aliphatic_____
   Aromatic_____
   Ketones_____
   Alcohols_____
   Other_____

C. Texture
   Solid_____
   Gel_____
   Sludge_____
   Liquid_____

D. Wt/Gal_____Fed Std. 141 Method 4041

E. Total Solids_____Valspar Method New 908C

C-2 WASTE ANALYSIS PLAN

Existing wastes have been evaluated to determine if they are hazardous. The wastes that are currently accumulated have been determined to be ignitable waste (D001), corrosive (D002), lead containing (D008) and waste solvent (F003, F005). To assure that all of these wastes are properly identified and managed - a primary analysis will be conducted on all wastes that are produced by Valspar. A more complete analysis will be required of the following wastes:

1. Any new waste unlike those currently produced and disclosed to the EPA.

C-2a PARAMETERS & RATIONALE FOR PRIMARY ANALYSIS

HAZARDOUS WASTE	PARAMETER	RATIONALE
1. Paint Waste & Filters D001	Odor aliphatic aromatic ketones alcohols others	These are odors that personnel are very familiar with and are a simple confirmation that the barrels contain materials that may cause them to be ignitable
	Texture solid gel sludge liquid	Needed to evaluate reuse potential and proper disposal
	Wt/Gal	Used to estimate shipping costs and incineration charges
	Total Solids	Used to estimate incineration sur-charges
	Flash Point	This is the property that makes this waste hazardous
	Color	This property is the distinctive in that each barrel is different
	EP Toxicity	Determine the absence of lead in the leachate

HAZARDOUS WASTE	PARAMETER	RATIONALE
2. Spent Caustic D002	Odor aliphatic aromatic ketones alcohols others	These are odors that personnel are very familiar with and are a simple confirmation that the barrels contain materials that may cause them to be ignitable
	Texture solid gel sludge liquid	Needed to evaluate reuse potential and proper disposal
	Wt/Gal	Used to estimate shipping costs and incineration charges
	Total Solids	Used to estimate incineration sur-charges
	Flash Point	This is the property that may make this waste hazardous
	pH	To determine if the material is corrosive
	EP Toxicity	Determine the absence of lead in the leachate

HAZARDOUS WASTE	PARAMETER	RATIONALE
3. Lead-Containing Paint Waste D008	Odor aliphatic aromatic ketones alcohols others	These are odors that personnel are very familiar with and are a simple confirmation that the barrels contain materials that may cause them to be ignitable
	Texture solid gel sludge liquid	Needed to evaluate reuse potential and proper disposal
	Wt/Gal	Used to estimate shipping costs and incineration charges
	Total Solids	Used to estimate incineration sur-charges
	Flash Point	This is the property that may make this waste hazardous
	Color	This property is distinctive in that each barrel is different
	Product Description	All raw materials and products are identified by a code which describes its contents. This code can be used to trace possibilities of lead contaminants.
	Chemical Analysis	Used to confirm presence of lead in suspect samples
	EP Toxicity	Determine the absence of lead in the leachate

HAZARDOUS WASTE	PARAMETER	RATIONALE
4. Waste Solvent F003 & F005	Odor aliphatic aromatic ketones alcohols others	These are odors that personnel are very familiar with and are a simple confirmation that the barrels contain materials that may cause them to be ignitable
	Texture solid gel sludge liquid	Needed to evaluate reuse potential and proper disposal
	Wt/Gal	Used to estimate shipping costs and incineration charges
	Total Solids	Used to estimate incineration sur-charges
	EP Toxicity	Determine the absence of lead in the leachate
	Evaluation	Determine if the wash solvent contains the constituents listed in 40CFR262 which qualify a waste as F003 & F005
5. All other wastes	Flash Point pH Reactivity EP Toxicity	To determine the hazard, if any of waste.

Method No. 908C

(Name) "Quick" non-volatile by weight.test.

SCOPE: "A fast method for determining weight percent solids of pigment dispersion and non-catalyzable vehicles and paints."

APPARATUS/ MATERIAL:

1. Aluminum foil weight dishes - 2 (18 mm deep x 70 mm diameter)
2. Electric hot plate (UL listed) - 1 (6 1/4 inches square)
3. Analytical balance - 1
4. Metal tweezers or other small metal grasping device.

PROCEDURE:

1. Weigh approx. 0.5 grams of sample into tared aluminum foil weighing dish ("cupcake tin"). Make duplicate run. Use tweezers for handling weighing dishes until test complete.
2. Record weights to nearest 0.0001 gram.
3. Dilute samples approx. 1:1 with appropriate solvent. Slowly swirl until samples are evenly distributed over bottom of each dish. This will avoid skin formation or "bumping" during heating process.
4. Place samples on hot plate set to 350-400°F. Hot plate must be located in a well ventilated area away from other volatile materials. Leave samples on hot plate until dry (15 minutes minimum).
5. Remove samples from hot plate. Allow a few minutes for temperature to reach ambience and re-weigh on analytical balance.
6. The calculated solids should be within 0.1% of each other. Report the average of two. If the samples are not within 0.1% run a third sample and report the average of the two which are within 0.1% of each other.

C-2b PARAMETERS & TEST METHODS

PARAMETER	TEST METHOD	REFERENCE
Texture	By Inspection	
Color	By Inspection	
Odor	By Inspection	
pH Primary Analysis	pH Hydrite Paper	Red Reg. Page 33122 Sec. 261.22
pH Secondary Analysis	Electrometric	Test Methods for evaluating Solid Waste, Physical/ Chemical methods.

	Reference	Detector	
	BNA241.582	GC^2/FID	
Xylol	"	"	8.02
Acetone	"	"	8.02
n-Butyl Alcohol	"	"	8.02
Methanol	"	"	8.01
Toluene	"	"	8.02
Methyl Ethyl Ketone	"	"	8.02
ISO Butonal	"	"	8.02
EP Toxicity		EP Test Procedure	40CFR 261 Appendix II
Flash Point		Pensky-Martin or Seta Flash	ASTM Std. D-93-79 or D-3278-78
Wt/Gal		Gravimetric	Fed Std. 141 Method 4041
Total Solids			Valspar Method 908C

NOTE: FID Stands for Flame Ionization Detector

C-2c SAMPLING METHODS

a. By placing drums on a two-drum tumbler and running at least 2 hours, extract 1 quart sample & NOTE the following Physical Characteristics:

PHYSICAL CHARACTERISTICS
CHECK & RECORD

A. Color _____

B. Odor
- Aliphatic _____
- Aromatic _____
- Ketones _____
- Alcohols _____
- Other _____

C. Texture
- Solid _____
- Gel _____
- Sludge _____
- Liquid _____

D. Wt/Gal _____ Fed Std. 141 Method 4041

E. Total Solids _____ Valspar Method New 908C

F. EP Toxicity _____

Liquid wastes with soft solids in the bottoms of the drums may be tumbled longer than 2 hours until the mixture is uniform and then sampled. Fill out SAMPLE Analysis Request Exh. "A" & Chain of Custody Record Exh. "B". Keep records of all transactions in a log book. Samples shall be sent with the chain and custody record to the laboratory. Results are to be reported on RCRA Hazard Assessment Test Report Exh. "C".

s890321e

EXHIBIT "A"

SAMPLE ANALYSIS REQUEST

PART I: FIELD SECTION

Collector _____ Date Sampled _____ Time _____ hours

Affiliation of Sampler _____

Address _____
number street city state zip

Telephone (___) _____ Company Contact _____

LABORATORY SAMPLE NUMBER	COLLECTOR'S SAMPLE NO.	TYPE OF SAMPLE*	FIELD INFORMATION

Analysis Requested _____

Special Handling and/or Storage _____

PART II: LABORATORY SECTION**

Received by _____ Title _____ Date _____

Analysis Required _____

* Indicate whether sample is soil, sludge, etc.
** Use back of page for additional information relative to sample location

EXAMPLE OF HAZARDOUS WASTE SAMPLE ANALYSIS REQUEST SHEET

EXHIBIT "B"

Collector's Sample No._____

CHAIN OF CUSTODY RECORD

Location of Sampling:____ Producer____ Hauler____ Disposal Site

____ Other:_____
Sample

Shipper Name:_____

Address:_____
number street city state zip

Collector's Name_____Telephone (___)_____
signature

Date Sampled_____Time Sampled_____hours_____

Field Information_____

_____

_____

Sample Receiver:

1._____
name and address of organization receiving sample

2._____

3._____

Chain of Possession:

1. _____ _____ _____
signature title inclusive dates

2. _____ _____ _____
signature title inclusive dates

3. _____ _____ _____
signature title inclusive dates

EXHIBIT "C"

RCRA HAZARD ASSESSMENT TEST REPORT

Client:_____ PN:_____
Sample ID:_____
Lab No.:_____ Date Received:_____ Date Reported:_____

5261.21 IGNITABILITY

Flash point_____°F (Max. allowed 140°F)

5261.22 CORROSIVITY

pH_____ (2 pH 12.5 allowed)
NACE corrosion rate _____ mm/yr (Max. allowed 6.35 mm/yr)

5261.23 REACTIVITY

Acid labile cyanide_____
Acid labile sulfide_____

5261.24 EP TOXICITY

Sample type: Solid_____ Semisolid_____ Liquid_____
If liquid or semisolid, filterable solids = _____%

NOTE: If sample contains less than 0.5% nonfiltrable solids, the filtrate is the extract.

Analytical Results
Values are concentrations of constituent in extract.

Constituent	Concentration, mg/l	Maximum concentration allowed, mg/l
Arsenic	_____	5.0
Barium	_____	100.0
Cadmium	_____	1.0
Chromium, total	_____	5.0
Chromium, hexavalent	_____	5.0
Lead	_____	5.0
Mercury	_____	0.2
Selenium	_____	1.0
Silver	_____	5.0
Endrin	_____	0.02
Lindane	_____	0.4
Methoxychlor	_____	10.0
Toxaphene	_____	0.5
2, 4-D	_____	10.0
2, 4, 5-TP	_____	1.0

261 Subpart D - Listed Waste _____

Submitted by:_____

C-2d FREQUENCY OF ANALYSIS

Primary analysis will be conducted on every lot of waste before it is sent to the Hazardous Waste storage area.

Secondary analysis of waste paint will be conducted annually, but no more frequently than once for each shipment.

Secondary analysis of new wastes will be conducted for each shipment.

27 FEB 1989

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William Smith IV
Valspar Corporation
2500 - 8th Avenue
East Moline, Illinois 61244

Re: Notice of Violation
Valspar Corporation
ILD 052 437 506

Dear Mr. Smith:

On November 15, 1988, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the compliance status of your facility with respect to the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The land disposal restrictions for F001-F005 waste solvents became effective on November 8, 1986, (reference 51 Federal Register 40636: revisions to 40 CFR Parts 260-265, 268, and 270-271) and for "California List" hazardous wastes on July 8, 1987, (reference 52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 265, 268, and 270-271).

With respect to the land disposal restrictions (40 CFR Part 268) section of the inspection, your facility was found to be in violation of the following:

1. Failure to revise the waste analysis plan to include 40 CFR Part 268 requirements in accordance with Section 265.13.

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violations have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ms. Janet Haff of my staff at (312) 353-7923.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA-CMS
Glen Savage, IEPA-FOS

bcc: Compliance file
Janet Haff

RCRA ENFORCE-MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	2/22/89	2.24.89	

F.O.S.

No WAP

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Valspar Corporation

U.S. EPA I.D. No.: ILD052437506 / State # 1610250001

Street: 2500 - 8th Avenue

City: E. Moline State: Illinois Zip Code: 61244

Telephone: 309/752-1450

Operator: Valspar Corporation

Street: 2500 - 8th Avenue

City: E. Moline State: Illinois Zip Code: 61244

Telephone: 309/752-1450

Owner: Valspar Corporation

Street: 2500 - 8th Avenue

City: E. Moline State: Illinois Zip Code: 61244

Telephone: 309/752-1450

Inspection Date: 11/15/88 Time: 10:30AM - 3:30PM Weather Conditions: Cloudy,

	Name	Affiliation	Telephone
Inspectors:	James Jones	DLPC/FOS	309/693-5462

Facility Representatives: William Smith IV, Plant Manager

	RCRA Status	LDR Status F-Solvent	LDR Status California List
Generator	Yes	F003, F005	
Transporter			
Treater			
Storer	Yes	F003, F005	
Disposer			

INSPECTION SUMMARY

Valspar Corporation is a manufacturer of paints. The solvents used to make their paints are toluene, xylene, mineral spirits, VM&P naptha, aromatic 100 and aromatic 150. The wastes generated from the paint-making processes are paint and solvent wastes (F003 and F005). The paint and solvent wastes are generated when various solvents are used to clean out their processing tanks which are used to make the paints. Toluene and xylene are the solvents most often used to clean out the processing tanks.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	F-Solvent Wastes					
1.	F001	____	____	____	____	____
2.	F002	____	____	____	____	____
3.	F003	✓	____	✓	____	____
4.	F004	____	____	____	____	____
5.	F005	✓	____	✓	____	____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes N/A

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	____	____	____	____	____
Cadmium	100 mg/L	____	____	____	____	____
Chromium VI	500 mg/L	____	____	____	____	____
Lead	500 mg/L	____	____	____	____	____
Mercury	20 mg/L	____	____	____	____	____
Nickel	134 mg/L	____	____	____	____	____
Selenium	100 mg/L	____	____	____	____	____
Thallium	130 mg/L	____	____	____	____	____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
____	____	____	____	____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

____	____	____	____	____

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No ____ NA

If yes, state reasons for mixing:

_____

_____

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

____	____	____	____	____

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   ✓ Yes ____ No ____ NA

   If yes, check the appropriate treatability group.

   ____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
   ____ Pharmaceutical wastewater containing spent methylene chloride
   ✓ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

      ____ Yes ____ No ✓ NA

      If yes, specify the method: _____

   b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      ____ Yes ____ No ____ NA

      If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

      _____
      _____
      _____

B. Waste Analysis

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

✓ Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

✓ Yes ____ No

If yes, note how this is adequate: The waste constituents identified in the analysis report are expressed in percentage form.

- TCLP

____ Yes ____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

✓ Yes ____ No ____ NA

If yes, specify the waste stream: Xylene (F003), Toluene (F005)

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes ✓ No ____ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?

The facility obtains a representative chemical and physical analyses of wastes and residues.

2. California List Wastes N/A

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ____ No ____ NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

____ Yes ____ No ____ NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added.

___ Liquid hazardous waste having a pH less than or equal to 2

___ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

___ Liquid hazardous waste containing metals

___ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

____ Yes ____ No ____ NA

If yes, note how this is adequate: _____

- Testing

____ Yes ____ No ____ NA

If yes, list test method used: _____

d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

____ Yes ____ No ____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ____ NA

C. Management

1. On-Site Management

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

✓ Yes ____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

✓ Yes ____ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

✓ Yes ____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	✓ Yes	____ No
Applicable treatment standards	✓ Yes	____ No
Manifest number	✓ Yes	____ No
Waste analysis data, if available	✓ Yes	____ No

Identify off-site treatment or storage facilities: American Chemical Service, 420 S. Colfax, Griffith, Indiana 46319

b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

____ Yes ✓ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

____ Yes ____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets treatment standards	_____ Yes	_____ No

Identify off-site land disposal facilities: _____

_____

_____

c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

_____ Yes _____ No _____ NA

D. <u>Treatment Using RCRA 264/265 Exempt Units or Processes</u> N/A
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes _____No

If yes, list types of waste treatment units and processes:

_____

_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

_____ Yes _____ No

If yes, check the appropriate regulatory status:
_____ Interim status for storage
_____ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____
_____
_____

B. Does the transporter mix, combine, or recontainerize wastes?

_____ Yes _____ No

C. Is the waste treated in an exempt treatment process on-site?

_____ Yes _____ No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

   o F-solvent ____ Yes ✓ No ____ NA

   o California List ____ Yes ____ No ✓ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

   ✓ Yes ____ No

   a. What date was the waste analysis plan last revised? Plan has not been revised

   b. Are analyses conducted on-site or off-site?

      ____ On-site ✓ Off-site

      Identify off-site lab: Arganic Industries, Inc., P.O. Box 208, 114 North Main St, Cottage Grove, Wisconsin 53527.

   c. Is F-solvent waste analyzed using TCLP?

      ____ Yes ____ No ✓ NA

   d. Describe the frequency of sampling: _____

   e. Describe procedures used to identify manifest discrepancies:

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

   ____ Yes ____ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

✓ Yes ____ No

If no, go to C, Treatment in Surface Impoundments.

2. If yes, check the appropriate method.

____ Tanks
✓ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

✓ Yes ____ No ____ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

✓ Yes ____ No

5. Do operating records agree with container labeling?

✓ Yes ____ No ____ NA

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

____ Yes ✓ No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

____ Yes ____ No

If yes, state how: ____

7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

_____ Yes _____ No _____ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

_____ Yes _____ No

8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

_____ Yes _____ No _____ NA

_____

_____

_____

C. <u>Treatment</u>

1. Does the facility treat restricted wastes other than in surface impoundments?

_____ Yes _____ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

_____

_____

_____

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

_____ Yes _____ No

4. Describe frequency of testing treatment residuals:

_____

_____

_____

5. Is dilution used as a substitute for treatment?

_____ Yes _____ No

6. Are notifications prepared by the generators kept in the facility's operating record?

_____ Yes _____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets the treatment standards	_____ Yes	_____ No

Identify off-site disposal facilities: _____

_____

_____

D. Treatment in Surface Impoundments

1. Are restricted wastes placed in surface impoundments for treatment?

_____ Yes _____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

_____

_____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Are the hazardous waste residues that exceed the treatment standards (268.41) removed adequately and on an annual basis?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?

_____ Yes _____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

_____

_____

E. <u>Land Disposal</u>

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes _____ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

_____

2. Does the facility operating record have notices and certifications from generators/storer/treaters [268.7(c); 268.7(a),(b)]?

_____ Yes _____ No

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____ Yes _____ No

If yes, at what frequency? _____

_____

4. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)?

_____ Yes _____ No

6. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

_____ Yes _____ No _____ NA

7. What is the volume of the restricted wastes disposed of to date?

_____

_____

8. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

_____ Yes _____ No _____ NA

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	____Yes	____No
trichloroethylene	____Yes	____No
methylene chloride	____Yes	____No
1,1,1-trichloroethane	____Yes	____No
carbon tetrachloride	____Yes	____No
chlorinated fluorocarbons	____Yes	____No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	____Yes	____No
trichloroethylene	____Yes	____No
methylene chloride	____Yes	____No
1,1,1-trichloroethane	____Yes	____No
chlorobenzene	____Yes	____No
trichlorofluoromethane	____Yes	____No
1,1,2-trichloro-1,2,2-trifluoroethane	____Yes	____No
ortho-dichlorobenzene	____Yes	____No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	____Yes	____No
acetone	____Yes	____No
ethyl acetate	____Yes	____No
ethyl benzene	____Yes	____No
ethyl ether	____Yes	____No
methyl isobutyl ketone	____Yes	____No
n-butyl alcohol	____Yes	____No
cyclohexanone	____Yes	____No
methanol	____Yes	____No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic? ____Yes ____No

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid	____Yes	____No
nitrobenzene	____Yes	____No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene	____Yes	____No
methyl ethyl ketone	____Yes	____No
carbon disulfide	____Yes	____No
isobutanol	____Yes	____No
pyridine	____Yes	____No

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Are the constituents used as chemical carriers?
____Yes ____No

If yes, list the constituents.

_____
_____

(b) Are the constituents used for degreasing/cleaning?
____Yes ____No

If yes, list the constituents.

_____
_____

(c) Are the constituents used as diluents?
____Yes ____No

If yes, list the constituents.

_____
_____

(d) Are the constituents used as extractants?
____Yes ____No

If yes, list the constituents.

_____

_____

(e) Are the constituents used for fabric scouring?
____Yes ____No

If yes, list the constituents.

_____

_____

(f) Are the constituents used as reaction and synthesis media?
____Yes ____No

If yes, list the constituents.

_____

_____

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.) ____Yes ____No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
68%	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
51%	ethyl ether
100%	

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
38%	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

APPENDIX B
TREATMENT STANDARDS FOR F-SOLVENTS

F001-F005 SPENT SOLVENTS	CONCENTRATION (IN MG/L) WASTEWATERS	OTHER WASTES
Acetone	0.05	0.59
N-butyl	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cycohexanone	.125	.75
1,2-dichlorobenzene	.65	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichlor 1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

Wastes shipped to:

TSD NAME LOCATION EPA ID NO.	TYPE OF FACILITY T/D METHODS	WASTE CODE	WASTE QUANTITY	COMMENTS (shipment dates, waste descriptions, etc.)
American Chemical 420 South Colfax Griffith, Indiana 46319 IND016360265	TSR	F003, F005	24,100 gals. generated in 1987	Waste paint Solvent Toluene, Xylene (shipment dates: 3/9/87, 5/2/87, 7/1/87, 9/16/87 and 11/9/87).

Wastes shipped to:

TSD NAME LOCATION EPA ID NO.	TYPE OF FACILITY T/D METHODS	WASTE CODE	WASTE QUANTITY	COMMENTS (shipment dates, waste descriptions, etc.)
American Chemical Service 420 South Colfax Griffith, Indiana 46319 IND 016360265	TSR	F003, F005	23,100 gals. in 1988	Paint & Solvent waste (F003, F005), Shipment dates: 2/25/88, 4/12/88. 6/14/88 and 8/10/88

5HR-12

31 AUG 1988

Mr. William Smith IV
Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

Re: Valspar Corporation
ILD 052 437 506

Dear Mr. Smith IV:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on August 19, 1988. The stated actions appear to adequately address the land disposal restrictions deficiency outlined in our July 19, 1988, Notice of Violation.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Ms. Janet Haff at (312) 353-7923.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Programs Section

cc: Glen Savage, IEPA
Harry Chappel, IEPA

	TYP.	AUTH.	IL/IN TECH. ENF. SEC.	MI/WI TECH. ENF. SEC.	OH/MN TECH. ENF. SEC.	IL/MI/WI ENF. PROG. SECTION	IN/MN/OH ENF. PROG. SECTION	RCRA ENF. BR. CHIEF	O. R. A.D.D.	WMD DIR
INIT.						P.E.D.				
DATE	8/25	8/26				8-30-88				

The Valspar Corporation
2500 Eighth Ave./East Moline, IL 61244
309/752-1450

August 17, 1988

Mr. Paul E. Dimock
United States Environmental Protection Agency
Region 5
230 South Dearborn St.
Chicago, Il. 60604

Re: 5HS-12

Dear Mr. Dimock:

Attached is the documentation you requested of identification of appropriate testability group of waste, and providing separate written notice to be attached to manifest for treatment. This notification was provided with our most recent shipment on August 10, 1988, and will continue for all future transactions.

Sincerely,

THE VALSPAR CORPORATION

William A. Smith IV

William A. Smith IV
Plant Manager

WASIV:sh

cc: Bill Steward, Minneapolis
Harry Chappel
Illinois EPA
5415 North University
Peoria, Illinois 61614

Attachments

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
P.O. Box 7035
Indianapolis, IN 46207-7035

PLEASE PRINT OR TYPE (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: I·L·D·0·5·2·4·3·7·5·0·6·
Manifest Document No.: 0·0·0·0·1
2. Page 1 of 1
Information in the shaded areas is not required by Federal law, but items D, F, H and I are required by State law.

3. Generator's Name and Mailing Address
VALSPAR CORPORATION
2500 EIGHTH AVENUE, EAST MOLINE, IL 61244

4. Generator's Phone (309) 752-1450

A. State Manifest Document Number: INA 0220856
B. State Generator's ID: 8878
C. State Transporter's ID: 0079
D. Transporter's Phone: 312-596-3377

5. Transporter 1 Company Name: MR. FRANK
6. Use EPA ID Number: I·L·D·0·6·9·5·0·6·1·6·0

7. Transporter 2 Company Name:
8. Use EPA ID Number:

E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address
AMERICAN CHEMICAL
420 S. COLFAX
GRIFFIN, IN 46823

10. Use EPA ID Number: I·N·D·0·1·6·3·6·0·2·6·5

G. State Facility's ID: 9180890002
H. Facility's Phone: 312-768-3400

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol.	I. Waste No.
a. WASTE FLAMMABLE LIQUID N.O.S. FLAMMABLE LIQUID UN1993	0·0·1	T·T	0.3.6.0.0	G	F003
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
WEAR SAFETY GLASSES AND GLOVES
AVOID BREATHING CONCENTRATED VAPORS

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: ROD BROWN
Signature: Rod Brown
Date: Month 0 8 Day 1 0 Year 8 8

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: PETER CRISAN IV
Signature: Peter Crisan
Date: Month 0 8 Day 1 0 Year 8 8

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: F DUNFEE
Signature: F Dunfee
Date: Month 0 8 Day 1 0 Year 8 8

In case of a spill call Indiana Office of Environmental Response at 317/243-5155 (day), or 317/633-0144 (night) and the National Response Center at 800/424-8802 or 202/426-2675.

INA 0220856

EPA Form 8700-22 (Rev. 9-86)
Previous editions are obsolete.
State Form 11865

DISTRIBUTION:
PAGE 1 (white) TSD MAIL TO GENERATOR
PAGE 2 (goldenrod) GENERATOR MAIL TO GENERATOR STATE
PAGE 3 (light green) TSD MAIL TO TSD STATE
PAGE 4 (light pink) OUT OF STATE GENERATOR/TSD MAIL TO IDEM
PAGE 5 (light blue) TSD COPY
PAGE 6 (canary) GENERATOR COPY
PAGE 7 (white) TRANSPORTER 1 COPY
PAGE 8 (white) TRANSPORTER 2 COPY

LAND DISPOSAL RESTRICTION NOTIFICATION

UNIROYAL Corporation hereby notifies AMERICAL Chemical Service that the waste described in Manifest Number 0220856 contains F001 F002 (F003) F005 (circle codes) spent solvents listed below. These wastes are subject to the land disposal prohibition with prior treatment to standards contained in 40CFR Part 268.

F001-F005 Spent Solvents	Waste Contains	40CFR Part 268 Subpart D Treatment Standard mg/liter CCWE
acetone	X	0.59
N-butyl alcohol		5.00
ethyl acetate		0.75
isobutanol		5.00
methanol	X	0.75
methylene chloride	X	0.96
methyl ethyl ketone	X	0.75
methyl isobutyl ketone		0.33
tetrachloroethylene		0.05
toluene	X	0.33
1,1,1-trichloroethane		0.41
1,1,2-trichloro, 1,2,2-trifluoroethane		0.96
trichloroethylene		0.091
trichlorofluoromethane		0.96
xylene	X	0.15

ORIGINAL COPY

STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

SHIPPED FROM VALSPAR CORP., EAST MOLINE, IL 61244 DATE 8-10-88

RECEIVED, subject to the classifications and lawfully filed tariff rates in effect on the date of the issue of this Bill of Lading,

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classifications in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SHIPPERS NUMBER _____

AMERICAN CHEMICAL COMPANY
420 S. COLFAX
GRIFFIN, IN 46823

Collect on Delivery, $ _____ and remit to:
_____ Street
_____ City
_____ State

C.O.D. Charge to be paid by:
SHIPPER ☐ CONSIGNEE ☐

CARRIER: MR. FRANK

FOR CHEMICAL EMERGENCY
SPILL, LEAK, FIRE, EXPOSURE, OR ACCIDENT
CALL CHEMTREC – DAY OR NIGHT
800-424-9300

FIBRE BOXES	METAL DRUMS 55 GAL.	METAL DRUMS 5 GAL.	METAL DRUMS 2 GAL.	HM	KIND OF PACKAGE, DESCRIPTION OF ARTICLES, SPECIAL MARKS AND EXCEPTIONS	CLASS	* WEIGHT (sub. to cor.)
					PAINT FLAMMABLE LIQUID UN 1263	55	
					PAINT FLAMMABLE LIQUID UN 1263 LTD. QTY.	55	
					PAINT	55	
					PAINT RELATED MATERIAL FLAMMABLE LIQUID, NA 1263	55	
					PAINT RELATED MATERIAL FLAMMABLE LIQUID, NA 1263 LTD. QTY.	55	
					PAINT OR RELATED MATERIAL CORROSIVE MATERIAL, NA 1760	55	
					CONSUMER COMMODITY, ORM-D (PAINT)	55	
					PAINT NOIBN DRY	55	
					HYDROCHLORIC ACID CORROSIVE MATERIAL UN 1789	70	
					XYLENE FLAMMABLE LIQUID, UN 1307	85	
					COMPOUND CLEANING LIQUID CORROSIVE MATERIAL, NA 1760	55	
					COMPOUND CLEANING LIQUID FLAMMABLE LIQUID, NA 1993	55	
					CLEANING OR WASHING COMPOUND OR SOAP NOI	55	
					BUFFING OR POLISHING COMPOUND NOI	55	
					ADVERTISING MATTER	70	

Drums	Port Tanks	Tank Wagon		HM			
					PAINT FLAMMABLE LIQUID UN 1263		
					PAINT COMBUSTIBLE LIQUID UN 1263		
					PAINT RELATED MATERIAL COMBUSTIBLE LIQUID NA 1263		
3600	GAL			X	WASTE FLAMMABLE LIQ. N.O.S. UN1993	30,600 LB.	ARX
					IF CHARGES ARE PREPAID MEMO COPY MUST BE ATTACHED TO ORIGINAL FREIGHT BILL AND SUBMITTED TO VALSPAR FOR PAYMENT		

Subject to Section 7 of Conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

VALSPAR CORP.

If prepaid, send freight bill to:
THE VALSPAR CORP.
P.O. Box 830
Minneapolis, MN. 55440

If charges are to be prepaid, write or stamp here, "to be Prepaid."

DISTRIBUTION CODE

CUSTOMER NUMBER

_____ Wooden Pallets Weighing _____ lbs.
Included with shipment but not included in total weight.

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation, according to the applicable regulations of the Department of Transportation.

VALSPAR CORP.

4 PLACARDS OFFERED
YES ☐ NO ☐

* If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight
NOTE-Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

VALSPAR CORP., Shipper, Per
Per Mr. Frank Anc

Peter Crisan Agent, Per F68-231 1

Permanent post-office address of shipper. 1101 So. 3rd St. Mpls. Minn.

G4S

JUL 19 1988

5HS-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William Smith
Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

Re: Notice of Violation
Valspar Corporation
ILD 052 437 506

Dear Mr. Smith:

On May 20, 1988, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The Land Disposal Restrictions for F001-F005 spent solvents became effective on November 8, 1986, (40 CFR Part 268, and revisions to 40 CFR Parts 260-265 and 270-271) and for California List" hazardous wastes on July 8, 1987, (refrence 52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 268, and 270-271).

With respect to the land disposal restrictions (40 CFR Part 268) section of the inspection, your facility was found to be in violation of the following:

1. Failure to determine the appropriate treatability group of the waste as required by Section 268.41; and

2. Failure to provide a separate written notice attached to the manifest for each shipment of F-solvent wastes with the U.S. EPA hazardous waste numbers, the applicable treatment standards, manifest number, and waste analysis data, where available, as required by Section 268.7(a)(1).

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violations have been corrected

and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ms. Janet Haff of my staff at (312) 353-7923.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA
Glenn Savage, IEPA

disk #3-7/13/88-or

CONCURRENCES								
SYMBOL								
SURNAME	O.R			P.E.D				
DATE	7/14/88	7/18/88		7-19-88				

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

*U.S. GPO : 1985-467-853

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. *↑(Extra charge)↑*
2. ☐ Restricted Delivery *↑(Extra charge)↑*

3. Article Addressed to:

Mr. William Smith
Valspar Corporation
2500 8th Avenue
East Moline, IL 61244

4. Article Number

P 571 916 753

Type of Service:

- ☐ Registered
- ☐ Insured
- ☒ Certified
- ☐ COD
- ☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee

X Terrie A Quinn

6. Signature — Agent

X

7. Date of Delivery

8. Addressee's Address *(ONLY if requested and fee paid)*

PS Form **3811**, Mar. 1987 ★ U.S.G.P.O. 1987-178-268 **DOMESTIC RETURN RECEIPT**

Rock Island County

F.O.S.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Valspar Corporation

U.S. EPA I.D. No.: ILD 052437506 LPC 1610250001

Street: 2500 - 8th Avenue

City: E. Moline State: Illinois Zip Code: 61244

Telephone: 309/752-1450

Operator: Valspar Corporation

Street: 2500 - 8th Avenue

City: E. Moline State: Illinois Zip Code: 61244

Telephone: 309/752-1450

Owner: Valspar Corporation

Street: 2500 - 8th Avenue

City: E. Moline State: Illinois Zip Code: 61244

Telephone: 309/752-1450

Inspection Date: 5/20/88 Time: 11:08AM-11:50AM Weather Conditions: Sunny, 74°F

	Name	Affiliation	Telephone
Inspectors:	James Jones	IEPA Region (3)	309/693-5462

Facility Representatives: William Smith IV, Plant Manager

	RCRA Status	LDR Status F-Solvent	LDR Status California List
Generator	Yes	F003, F005	None
Transporter			
Treater			
Storer			
Disposer			

RECEIVED
JUN 09 1988
IEPA-DLPC

RECEIVED
JUN 20 1988
Waste Management Division
OFFICE OF RCRA
U.S. EPA, REGION V

Revised 11-03-87

INSPECTION SUMMARY

Valspar Corporation is a manufacturer of paints. The solvents used to make their paints are toluene, xylene, mineral spirits, VM&P naptha, aromatic 100 and aromatic 150. The wastes generated from the paint-making processes are paint and solvent wastes (F003 and F005). The wastes are manifested to American Chemical, 420 South Colfax, Griffith, Ind. 46319 where it is blended for energy recovery.

RECEIVED
JUN 09 1988
IEPA-DLPC

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	F-Solvent Wastes					
1.	F001	____	____	____	____	____
2.	F002	____	____	____	____	____
3.	F003	Yes	____	____	____	____
4.	F004	____	____	____	____	____
5.	F005	Yes	____	____	____	____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes N/A

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	____	____	____	____	____
Cadmium	100 mg/L	____	____	____	____	____
Chromium VI	500 mg/L	____	____	____	____	____
Lead	500 mg/L	____	____	____	____	____
Mercury	20 mg/L	____	____	____	____	____
Nickel	134 mg/L	____	____	____	____	____
Selenium	100 mg/L	____	____	____	____	____
Thallium	130 mg/L	____	____	____	____	____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
____	____	____	____	____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

____	____	____	____	____

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No ____ NA

If yes, state reasons for mixing:

_____

_____

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

____	____	____	____	____

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   ____ Yes ____✓ No ____ NA

   If yes, check the appropriate treatability group.

   ___ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
   ___ Pharmaceutical wastewater containing spent methylene chloride
   ___ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

      ____ Yes ____ No ____✓ NA

      If yes, specify the method: _____

   b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      ____ Yes ____ No ____✓ NA

      If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

      _____
      _____
      _____

B. Waste Analysis

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

✓ Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

✓ Yes ____ No

If yes, note how this is adequate: Solvents (xylene + Toluene) used by facility are 100% pure grade.

- TCLP

____ Yes ____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

✓ Yes ____ No ____ NA

If yes, specify the waste stream: Xylene (F003), Toluene (F005)

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes ✓ No ____ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?

Facility's processes have not changed

2. California List Wastes

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ____ No ✓ NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

_____ Yes _____ No _____ NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added.

___ Liquid hazardous waste having a pH less than or equal to 2

___ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

___ Liquid hazardous waste containing metals

___ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

_____ Yes _____ No _____ NA

If yes, note how this is adequate: _____
_____
_____

- Testing

_____ Yes _____ No _____ NA

If yes, list test method used: _____

d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____
_____
_____
_____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

C. Management

1. On-Site Management

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

_____ Yes ✓ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

✓ Yes _____ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

_____ Yes ✓ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No

Identify off-site treatment or storage facilities: _____

_____

b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

_____ Yes ✓ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets treatment standards	____ Yes	____ No

Identify off-site land disposal facilities: _____

_____

_____

c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

____ Yes ____ No ____ NA

D. <u>Treatment Using RCRA 264/265 Exempt Units or Processes</u> N/A
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

____ Yes ____No

If yes, list types of waste treatment units and processes:

_____

_____

The Valspar Corporation

1101 Third Street South/Minneapolis, MN. 55415/(612)332-7371

January 11, 1982

ILD001980135 MGP 1-18-82
(# on PA is incorrect)

Lisa Binder
USEPA Region V
230 South Dearborn St.
Chicago IL 60604

Dear Ms. Binder,

Please be advised that Mr. Albert J. Espinel, Plant Manager of our Minneapolis operations is also Chairman of our Corporate Waste Management Task Force, and as such is authorized to sign as an official of the Corporation, EPA Form 3510.1 (6-80) & EPA Form 3510.3 (6-80).

Very Truly Yours,

John Whealy
Vice President of Operations

JW/dp

ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

L P C F C 0 5 5 C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO. _ _ _ _ _ _ _
(11) (18)

_____ CO. - L.P.C. Region # _____ Date _ _/_ _/_ _
(20) (25)

_____/_____ Letter Sent (Yes or No) ___
(Location) (Responsible Party) (26)

Samples Taken: Yes ( ) No ( ) Time: From _ _ : _ _ m Weather _____
Ground Water( ) Surface( ) Other( ) To _ _ : _ _ m
Photos Taken: Yes ( ) No ( ) Interviewed _____ Inspector ___ ___ ___
(27) (29)

Previous Inspection _____ Previous Correspondence _____ Site Open: Yes( ) No( )

OPERATIONAL STATUS:		TYPE OF OPERATION:				AUTHORIZATION:	
Operating	( )	Landfill	( )	Storage	( )	E.P.A. Permit	( )
Temporarily Closed	( )	Random Dump	( )	Salvage	( )	Variance	( )
Closed Not Covered	( )	Other _____	( )	A.C.D.	( )	21(e)	( )
Closed and Covered	( )	Quantity Received Daily(1-6)		_____ (30)		Board Order	( )
						Illegal (5)	( ) ___ (31)

IMPROVED

LPC 4 1/79 5,000

SAME

DETERIORATED

I S or D ___ (62)

GENERAL REMARKS: The Valspar Corporation produces paint from lead chromate. Four hazardous wastes are generated during the process-spent caustic, solvent cleaning wastes, water cleaning wastes and air pollution control sludges. All wastes are transported to a landfill with the exception of the solvent cleaning wastes which are reclaimed by Acme Solvent in Rockford.
Tim Jones, plant manager, and I toured the facility's laboratory, barrel storage area, paint powder storage area, mixing area, raw material bulk storage area, vessel cleaning area, and organic solvent tank area.

INTERVIEW: Machinery and tanks are cleaned with solvent, water and/or caustic. The liquids are then pumped into barrels. The reclaimable solvents are pumped from the barrels into an old paint manufacturing tank (steel) and via overhead piping are pumped outside to a tank truck. Mr. Jones stated that wet screenings from the paint mixing process are hazardous and are stored in barrels (eight observed), while dry paint on paper in the laboratory, is non-hazardous and is thrown into the trash can.
Caustics are used to clean 350 gallon paint vessels. Caustic is removed from the vessels using hot water in an automatic-self contained system. Hot water (cont)

DIAGRAM:

ILLINOIS EPA ILLINOIS ENVIRONMENTAL PROTECTION AGENCY MEMORANDUM

TO: _____ DATE: 2/20/91

FROM: _____ ☐ Information only

SUBJECT: Valspar, LSS (cont'd) ☐ Response requested

enters the vessels and then flows into an underground sump. This is the area repeatedly complained about as the source of discharges from the facility. Mr. Jones denies any knowledge of caustics flowing from this area.

Wastes are stored in barrels on the north side of the facility. They are stored uncovered, on concrete, 30 feet from the fencing. Mr. Jones could not give me a description of the wastes stored in barrels. He said they may or may not be hazardous. He said the contents of the barrels have not been identified yet and that a waste is not hazardous until it is deemed so by Valspar.

NIL000624375 06
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS -
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 1 - General Facility Standards

I. General Information:

(A) Facility Name: The Valspar Corporation

(B) Street: 2500 8th Avenue

(C) City: EAST MOLINE (D) State: ILLINOIS (E) Zip Code: 61244

(F) Phone: 309 7521450 (G) County: ROCK ISLAND

(H) Operator: THE VALSPAR CORPORATION

(I) Street: 2500 8th AVENUE

(J) City: EAST MOLINE (K) State: ILLINOIS (L) Zip Code: 61244

(M) Phone: 307 7521450 (N) County: ROCK ISLAND

(O) Owner: THE VALSPAR CORPORATION

(P) Street: 2500 8th Avenue

(Q) City: EAST MOLINE (R) State: ILLINOIS (S) Zip Code: 61244

(T) Phone: 307 7521450 (U) County: ROCK ISLAND

(V) Type of Ownership: ___ Federal ___ Municipal ✓ Private
___ State ___ County

(W) Date of Inspection: 2/26/81 (Q) Time of Inspection (From) 230 p (To) 530 p

(X) Weather Conditions: SUNNY → DUSK DAMP SOIL ≈ 40° F

) Person(s) Interviewed	Title	Telephone
TIM JONES	PLANT MANAGER	309 7521450

) Inspection Participants	Title	Telephone
TIM JONES	PLANT MANAGER	309 7521450

II. Description of Site Activity

(A) ✓ Generator (Form 2)

(B) ____ Transporter (Form 3)

(C) ____ Chemical, Physical and Biological Treatment (Form 4)

(D) ✓ Storage (Form 5)

(E) ____ Landfill (Form 6)

(F) ____ Incineration (Form 7)

(G) ____ Land Treatment (Form 4)

(H) ____ Thermal Treatment (Form 7)

(I) Comments: _____

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

	Yes	No	Not Inspected	See Remark Number
(J) Has this facility Submitted a Part A Permit Application?	✓			

III GENERAL FACILITY STANDARDS

	Yes	No	Not Inspected	See Re Number
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?		✓	✓	A1
2. Transfer of Ownership?		✓	✓	A2
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓			B_1
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?		✓	✓	B_2
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?		✓	✓	B_3
(C) Security - Do security measures include:				
1. 24-Hour Surveillance?	✓		✓	C1
2. Artificial or Natural Barrier Around Facility?	✓			C_2
3. Controlled Entry?	✓			
4. Danger Sign(s) at Entrance?		✓	✓	
(D) Do Owner or Operator Inspections Include:				
1. Records of Malfunctions?	✓			D
2. Records of Operator Error?	✓			
3. Records of Discharges?	✓			
4. Inspection Schedule?	✓			
5. Safety, Emergency Equipment?	✓			
6. Security Devices?	✓			
7. Operating and Structural Devices?	✓			
8. Inspection Log?	✓			

	Yes	No	Not Inspected	See Remark Number
(E) Do Personnel Training Records Include:				
1. Job Titles?		✓	✓	E
2. Description of Training?		✓	✓	
3. Records of Training?		✓	✓	
Is Personnel Training Completed within the Required Time Frame?		✓	✓	
(F) Are the Following Special Requirements for Ignitable, Reactive, or Incompatible Wastes Addressed?				
1. Special Handling?	✓			F
2. No Smoking Signs?	✓			
3. Separation and Confinement?	✓			

IV. PREPAREDNESS AND PREVENTION

	Yes	No	Not Inspected	See Remark Number
(A) Maintenance and Operation of Facility:				
1. Is there any evidence of fire, Explosion, or release of hazardous waste or hazardous waste constituent?	✓			A
(B) Does the Facility have the Following Equipment:				
1. Alarm System?	✓		✓	B
2. Telephone or 2-Way Radios?	✓			
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓		✓	

Indicate the volume of water and/or foam available for fire control:

Units: 200,000gallons

	Yes	No	Not Inspected	See Remark Number
C) Testing and Maintenance of Emergency Equipment:				
1. Has the Owner or Operator established Testing and Maintenance Procedures for Emergency Equipment?	✓		✓	C
2. Is Emergency Equipment Maintained in Operable Conditions?	✓		✓	C
(D) Has Owner or Operator Provided Immediate Access to Internal Alarms (if needed)?	✓		✓	
(E) Is there Adequate Aisle Space for Unobstructed Movement?	✓			
(F) Are Arrangements with Local Authorities Included in the Operating Record?	✓			F

VI. CONTINGENCY PLAN AND EMERGENCY PROCEDURES

(A) Does the Contingency Plan Contain the Following Information:				
1. The actions facility personnel must take to comply with §264.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)	✓			A
2. Arrangements agreed to by Local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §264.37?	✓			A

	Yes	No	Not Inspected	See Remark Number
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?		✓	✓	A3
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?		✓	✓	
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.)	✓			A
(B) Are copies of Contingency Plan Available at Site and local Emergency Organizations?	✓		✓	
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?		✓	✓	
2. Is Coordinator Familiar with all aspects of site operation and emergency procedures?		✓	✓	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?		✓	✓	
(D) Emergency Procedures				
If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency procedures listed in 256.56?				D

VII. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING

	Yes	No	Not Inspected	See Rem Number
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?	✓			
2. Are records of past shipments retained for 3 years?		✓ N/A not in operation	✓	A2
(B) Does the owner or operator meet requirements regarding Manifest Discrepancies?				B
(C) Operating Record				
Does the facility maintain an operating record at the site as required in §265.73?		✓	✓	
(D) Availability, Retention and Disposition of Records				
Are all records available at the site for inspection as required in §265.74?		✓	✓	

VIII. CLOSURE AND POST CLOSURE

(A) Closure and Post Closure				
1. Closure Plan Available for Inspection by May 19, 1981?		✓	✓	A
2. Has this plan been submitted to the Regional Administrator?		✓	✓	
3. Has Closure begun?		✓	✓	
4. Is closure cost estimate available by May 19, 1981?		✓	✓	
(B) Post Closure Care and Use of Property - Has the Owner or Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?		✓	✓	

REMARKS

FORM I - GENERAL FACILITY STANDARDS

III. GENERAL FACILITY STANDARDS

A. 1) N/A
2) N/A

B. 1) IEPA Supplemental Permit # 792932 "Waste Paint & Solvent" for Peoria Disposal, #78028 "Spent Caustic", #792932 "Solvent & Paint" None for air pollution control sludges or water cleaning wastes
2) N/A
3) N/A

C. 1) Permar Security System. Perimeter is patrolled after hours. Interior electronic alarms detect fire and/or intruders.
2) Entire facility contained within barbed wire fence

D. Monthly safety and housekeeping inspections. Problems are noted and remedial action required. Safety meetings are held periodically.

E. All employees are involved and thus trained regarding handling hazardous wastes. Periodic safety meetings.

F. The fire chief inspects weekly. Mr. Jones claims the wastes are "flammable", not"ignitable".

IV PREPAREDNESS AND PREVENTION

A. Paint has been spilled inside and outside thesfacilities fencing. IEPA/DLPC is currently investigating a complaint regarding spent caustic leaving the site in the past. Paint spilled outside western fence was photographed.

B. Thermostatic sensing in sprinkler system is connected to Pelmar Fire Department, and Police Department by phone. The facility has 46 fire extinguishers and uses mops to control spills. Approximately 200,000 gallons of water ~~is~~ are available.

C. Tested weekly by Permar

F. See attached Emergency Plan

VI CONTINGENCY PLAN & EMERGENCY PROCEDURES

A. See attached Emergency Plan

3) Mr. Jones could not find this document. He didn't know the 3 employees designated as coordinators but said one is a foreman and one is a chemist.

D. N/A

VII. MANIFEST SYSTEM, RECORDKEEPING & REPORTS

A. 2) Records have been kept since Illinois initiated the manifest system.

B. N/A

VIII. ~~CLOSE~~ CLOSURE AND POST CLOSURE

If facility closed, everything would be moved to another branch facility.

WILD052437506
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form 2 - Generator Inspection

1. General Information:

(A) Installation Name: The Valspar Corporation

(B) Street: 2500 8th Avenue

(C) City: EAST MOLINE (D) State: IL (E) Zip Code: 61244

(F) Phone: 309 7521450 (G) County: ROCK ISLAND

(H) Operator: The Valspar Corporation

(I) Street: 2500 8th Avenue

(J) City: EAST MOLINE (K) State: IL (L) Zip Code: 61244

(M) Phone: 309 752 1450 (N) County: ROCK ISLAND

(O) Owner: The Valspar Corporation

(P) Street: 2500 8th Avenue

(Q) City: East Moline (R) State: IL (S) Zip Code 61244

(T) Phone: 309 7521450 (U) County: ROCK ISLAND

(V) Type of Ownership: ____ Federal ____ Municipal ✓ Private ____ State ____ County

(W) Date of Inspection: 2/26/81 Time of Inspection (From) 230p (To) 530p

(X) Weather Conditions: SUNNY → DUSK, DAMP SOIL, ≈ 40°F

(Y) Person(s) Interviewed	Title	Telephone
Mr. Tim Jones	Plant Manager	307 752 1450

(Z) Inspection Participants	Title	Telephone
Mr. Tim Jones	Plant Manager	307 752 1450

II. OTHER TYPE OF HAZARDOUS WASTE ACTIVITY

(A) ____ Transporter (Form 3)

(B) ____ Chemical, Physical and Biological Treatment (Form 4)

(C) ✓ Storage (Form 5)

(D) ____ Landfill (Form 6)

(E) ____ Incineration (Form 7)

(F) ____ Thermal Treatment (Form 7)

(G) Comments: _____

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

	Yes	No	Not Inspected	See Remark Number
(D) Pre-shipment Accumulation:				
1. Are containers marked with start of accumulation date?		✓	✓	1.
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?		✓	✓	1
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?		✓	✓	3
4. Are wastes stored in tanks managed according to the following:				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	✓		✓	4a
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?		✓ tank recently to visit.	✓	4b
c. Do continuous feed systems have a waste-feed cutoff?		✓ have this per Command etc	✓	4c.
d. Are required daily and weekly inspections done?		✓	✓	
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requi em nts?		✓ check with inspector - don't imagine there have reactive/ignitable wastes	✓	
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)		✓ no incompatible wastes noted	✓	4f

III. MANIFEST

	Yes	No	Not Inspected	See Remark Number
(A) Are copies of the Manifest available?	✓			
(B) Does the Manifest contain the following information:				
1. Manifest document number?	✓			
2. Name, mailing address, telephone number, and EPA ID Number of Generator?	✓			
3. Name and EPA ID Number of Transporter(s)?	✓			
4. Name, Address, and EPA ID Number of Designated permitted facility and alternate facility?	✓			
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			B5
6. The total quantity of waste(s) and the type and number of containers loaded?	✓			
7. Required Certification?		✓		
8. Required Signatures?	✓			
(C) Does the Owner or Operator Submit Exception Reports when Needed?	✓			C

IV. PRE-TRANSPORT REQUIREMENTS

(A) Is Generator Packaging waste in accordance with DOT Regulations?	✓		✓	A
B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials?	✓		✓	B
C) If required, are placards available to transporter?		✓	✓	C

		Inspected	Number
5. If hazardous wastes accumulate on site, does the generator follow the following general facility standards?			
A. Do Personnel training records include:			
1. Job Titles?	✓	✓	
2. Description of Training?	✓	✓	
3. Records of Training?	✓	✓	
Is Personnel Training Completed within the Requried Time Frame?	✓	✓	
B. Prepardness and Prevention			
1. Maintenance and Operation of Facility:			
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	✓		
2. Does the Facility have the following equipment?			
a. Alarm system?	✓	✓	
b. Telephone or 2-Way Radios?	✓		
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓	✓	

Indicate the volume of water and/or foam available for fire control

Units: 200,000 gallons

3. Testing and Maintenance of Emergency Equipment:			
a. Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment	✓	✓	
b. Is emergency equipment Maintained in Operable Condition?	✓	✓	

	Yes	No	Not Inspected	See Remark Number
4. Has Owner/Operator Provided Immediate Access to Internal Alarms (if needed)?	✓		✓	
5. Is there adequate Aisle Space for unobstructed Movement?	✓			
6. Are arrangements with local authorities included in the operating record?	✓			
(C) Contingency Plan and Emergency Procedure				
1. Does the contingency plan contain the following:				
a. The actions facility personnel must take to comply with §264.51 and 261.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part)	✓			
b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §264.37?	✓			
c. Names, addresses, and Phone numbers (office and Home) of all persons qualified to act as emergency coordinator.		✓	✓	
d. A list of all emergency equipment at the facility which include the location and physical description of each item on the list, and a brief outline of its capabilities?		✓	✓	
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.	✓			

	Yes	No	Not Inspected	See Remark Number
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
a. Met the manifest requirements?				

VII. PREPARER INFORMATION

Name: Pamela LoPinto

Title: LSCT I EPA/DLPC

Phone Number: 815 9877404

REMARKS:

	Yes	No	Not Inspected	See Remark Number
2. Are copies of the Contingency Plan available at site and local Emergency Organizations?	✓		✓	
3. Emergency Coordinator				
a. Is the Facility Emergency Coordinator Identified?		✓	✓	
b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures?		✓	✓	
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?		✓	✓	
4. Emergency Procedures				
If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in §256.56?				4

V. RECORDKEEPING

(A) Are Manifests, Annual Reports, Exception Reports, and All Test Results and Analyses Retained for at least three years?		✓		A

VI. INTERNATIONAL SHIPMENTS

(A) Has the Installation Imported or Exported Hazardous Waste?		✓		
(If A was answered Yes, then complete one or both of the following)				
1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?				
b. Obtained the Signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				

REMARKS

FORM II - GENERATOR INSPECTION

III. MANIFEST

The first manifest was used in October of 1979. The last load hauled was December 16, 1980.

B. 5) "Paint Waste"

C. Never needed in the past

IV. PRE-TRANSPORT REQUIREMENTS

A., B. Mr. Jones claims packaging, marking and labeling are done properly. No barrels were being prepared for transportation during my visit.

C. Peoria Disposal and Acme Solvent have their own placards.

1) Valspar has applied as a storage facility

3) Barrels are the 170H type. Inspections monthly of "flammable" wastes. Waste are 30 feet from the property line.

4) a. A steel tank contains recoverable solvents and paint.
b. The tank is covered.
c. The system to clean paint from vessels, using caustic, has an automatic shut-off device and timer.
f. N/A

CONTINGENCY PLAN

4. N/A

V. RECORD KEEPING

A. Since October 1979

ILD052437506
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
SUPPLEMENTAL FORM 5 FOR STORAGE FACILITY INSPECTIONS

I. General Information

(A) Facility Name: The Walspan Corporation

(B) Street: 2500 8th Avenue

(C) City: East Moline (D) State: IL (E) ZIP Code 61244

(F) Date of Inspection: 2/26/81

II. Storage Facility Standards (Part 265)

A. Facilities which store containers of hazardous waste (Subpart I)

	YES	NO	NOT INSPECTED	REMARK #
1. Are containers in good condition?	✓			
2. Are containers compatible with waste in them?	✓			
3. Are containers stored closed?	✓			
4. Are containers managed to prevent leaks?	✓			
5. Are containers inspected weekly for leaks and defects?		✓		
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?		✓		
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)				N/A
8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?				N/A

B. Facilities which store hazardous waste in tanks (Subpart J)

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	✓			
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				N/A

Continued on next page

	YES	NO	NOT IN-SPECTED	REMARK #
3. Do continuous feed systems have a waste-feed cutoff?				N/A
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				N/A
5. Are required daily and weekly inspections done?		✓		
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	✓			
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)				N/A

C. Facilities which store hazardous waste in surface impoundments (Subpart K)

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?				
2. Do earthen dikes have protective cover?				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?				
4. Is the freeboard level inspected at least daily?				
5. Are the dikes inspected weekly for evidence of leaks or deterioration?				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)				

D. Facilities which store hazardous waste in waste piles (Subpart L)

1. Are waste piles covered or protected from the wind?				
2. Is each in-coming movement of waste analyzed before being added to the waste pile?				
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1980.)				
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				

Continued on next page

	YES	NO	NOT IN-SPECTED	REMARK #
Are piles of reactive or ignitable waste protected?				
Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)				
Are piles of incompatible waste protected by barriers or distance from other waste?				

#11. If Fire is small contain with Fire Extinguishers.

#12. Department Supervisors are responsible to count his people being sure everyone is accounted for.

#13. Direct Fire Department to its source.

EXPLOSION

#1. Procedure as for Fire.

#2. Call for Ambulance:
East Moline 792-8634
Illini Hospital 792-9363

#3. Notify Iowa-Illinois Gas & Electric Company - 788-8421

#4. Notify - Area Residence

FLOOD CONTROL

#1. Place all pigment pallets on top of drums in the orange warehouse.

#2. Unload floor tanks into whatever container is available; drums, portable tanks, etc., and fill floor tanks with water.

#3. Pull floor mounted motors and store off the floor.

#4. Sand bag doorways to main plant.

#5. Plug sewers and toilets, floor drains, etc.

#6. Close fence gates to contain empty drums.

#7. Be absolutely sure the gasoline pump is in operating condition.

#8. Check other plants for available gas pumps for emergency loan.

#9. Keep checking with the city engineer continually on flood level.

#10. Check sand bag availability and plastics.

inter - office correspondence

TOWN EAST MOLINE, IL DATE 10/10/79

TO ALL EMPLOYEES REPLYING TO YOURS DATED

FROM RAYMOND R. SONNEE

SUBJECT EMERGENCY PLAN

COPIES TO ALL EMPLOYEES, JOHN WHEALY, RICHARD RADFORD

Listed are procedures that should be followed in the event of Fire, Explosion, Major Spill of Material, Serious or Multiple Injuries or Fatality, Vapor Omission, or Natural Disaster such as Tornado, Flood, etc:

FIRE PROCEDURE

(ALARM- Loud Continuous Buzzer)

#1. Shut off all machinery, Resin and Thinner that may be running.

#2. Close all windows and doors.

#3. Labs - Close bucket lids in wash areas.

#4. Personnel - Front Office, Quality Control, Sales, should leave by the front door.

#5. Premixers and Mill Operators leave out the West door or South exit.

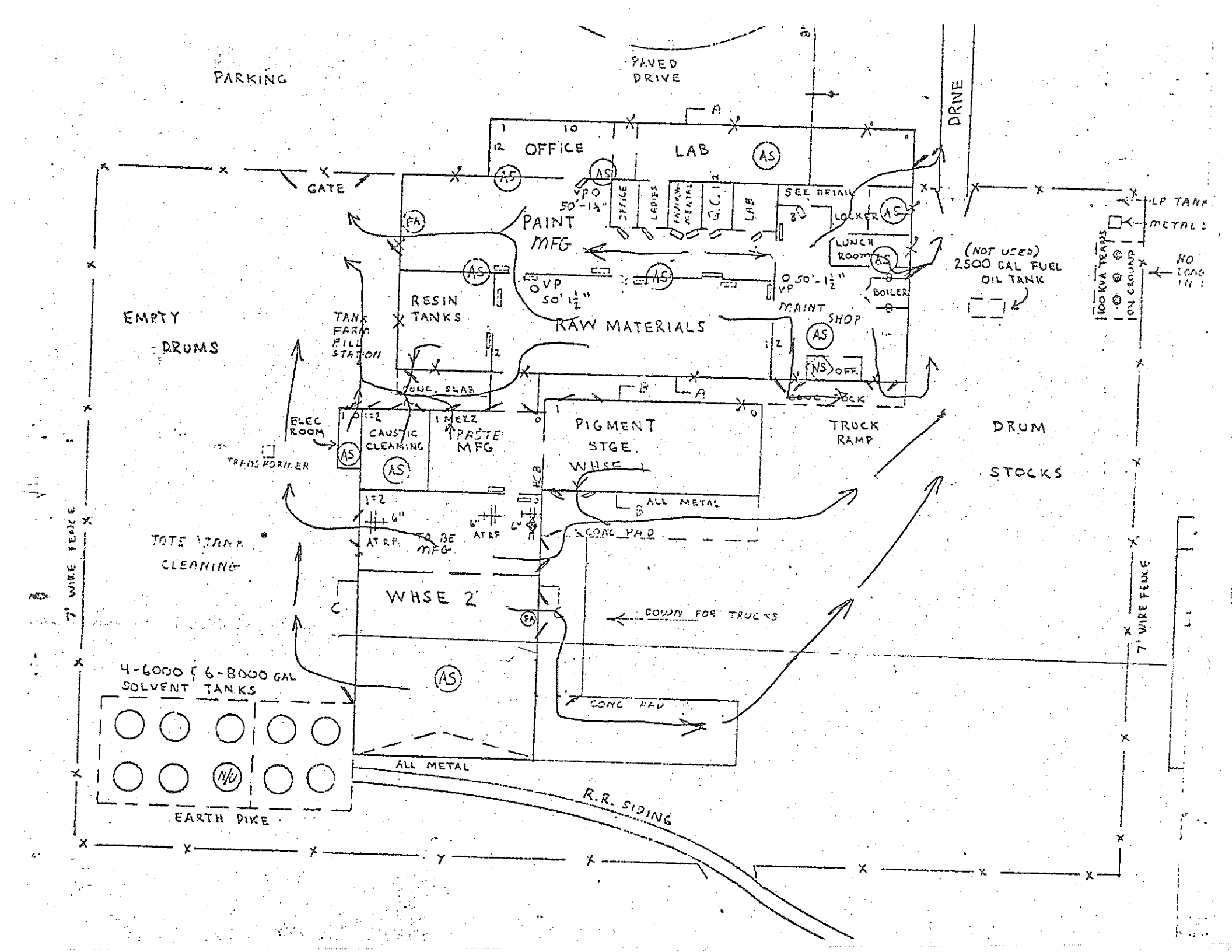
#6. Thinners, Fillers, Tinters, should exit by East on West doors; Office if need be depending on Fire location.

#7. Receiving Personnel - Leave by South door.
Shipping Personnel - Leave by East door.

#8. Tank Cleaners - Leave by North door.

#9. All Personnel should stage North of our Office (to be accounted for)

#10. Break glass for Fire Department and Switchboard call Fire Department at 755-1515.


PARKING
PAVED DRIVE
DRIVE
OFFICE
LAB
GATE
PAINT MFG
RESIN TANKS
RAW MATERIALS
MAINT SHOP
LUNCH ROOM
BOILER
LOCKER
SEE DETAIL
(NOT USED) 2500 GAL FUEL OIL TANK
LP TANK
METAL
EMPTY DRUMS
TANK FARM FILL STATION
CONC. SLAB
ELEC ROOM
TRANSFORMER
CAUSTIC CLEANING
PASTE MFG
PIGMENT STGE.
WHSE 1
ALL METAL
TRUCK RAMP
DRUM STOCKS
TOTE TANK CLEANING
AT RF.
TO BE MFG
CONC YARD
WHSE 2
DOWN FOR TRUCKS
4-6000 & 6-8000 GAL SOLVENT TANKS
EARTH DIKE
R.R. SIDING
7' WIRE FENCE
7' WIRE FENCE

inter - office correspondence

TOWN EAST MOLINE, ILLINOIS DATE 1/27/81

TO ALL EMPLOYEES REPLYING TO YOURS DATED

FROM TIM JONES

SUBJECT EMERGENCY PLAN

COPIES TO D. OCHS, D. RADFORD, J. WHEALY, BULLETIN BOARD

As part of our emergency plan, you must all be familiar with all the exits and alternate escape routes in case of an emergency and ways to be used during fire drills.

Attached is a site plan to become familiar with.

Tim

Tim Jones

TJ:sc

Attachment

#11. Pull main electric service on building.

#12. Check with Per Mar for guard service if flooded.

#13. Set up guard duty for diking and pumping as needed.

#14. Close all valves on solvent and resin tanks.

#15. Be sure all drums are sealed full or empty.

#16. If need be, set all office furniture and records on drums.

#17. Shut off main gas service.

#18. Scale pits, we should keep a good eye on these continuously as water may seep through.

MAJOR SPILLS

In the event of a Major Spill, we should do the following:

#1. Block sewer openings.

#2. Notify the local Fire Department - 755-1515.

#3. Notify the Environmental Protection Agency
Local Number - 797-3343
State Number - 217-782-3637

#4. Estimate the amount of spill and proceed to clean up.

SERIOUS OR MULTIPLE INJURIES OR FATALITY

#1. Call Ambulance
East Moline - 792-8634
Illini Hospital - 792-9363

When calling the East Moline Number inform them if rescue work is needed. Inform Illini of the number of injuries to expect.

#2. Administer First Aid.

#3. Notify spouse or parent.

#4. Do not give information to News Media (Paper, TV, Radio, etc.,) it would be a poor way to be informed in the event of serious injury or fatality.

VAPOR OMISSION

#1. Clear plant same as Fire.

#2. Notify Fire Department.

#3. Notify Enviornmental Protection Agency, Division of Air Pollution Control - 797-3343

TORNADO

In the event a Tornado is sited in the East Moline area, the City will sound its siren continuously. All personnel should do the following after it has been determined the direction of the storm:

#1. If time permits, open all windows and doors.

#2. Go to the nearest wall on corner in the direction of the storm. It would be best not to remain in the Manufacturing Area. The dock pits would be ideal if the approaching storm is from the proper direction.

#3. If injuries should occur, give First Aid and notify Police, Fire, Ambulance.

Ambulance	792-8634
Fire Department	755-1515
Illini Hospital	792-9363

Inform Illini Hospital of the number of injured to expect.

Ms Janet Haff 5HR-12

P 250 862 558

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

★ U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

Sent to Mr. William Smith III	
Street and No. 2500 - 8th Avenue	
P.O., State and ZIP Code East Moline, Illinois 61244	
Postage	$1.25
Certified Fee	.85
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	.90
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$2.80
Postmark or Date	CHICAGO IL LOOP STA FEB 27 '89

+

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.
1. ☒ Show to whom delivered, date, and addressee's address. *(Extra charge)* 2. ☐ Restricted Delivery *(Extra charge)*

3. Article Addressed to: Mr. William Smith III, Valspar Corporation, 2500 - 8th Avenue, East Moline, Illinois 61244	4. Article Number P 250 862 558
	Type of Service: ☐ Registered ☐ Insured ☒ Certified ☐ COD ☐ Express Mail
	Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature – Addressee X Sherry Hyatt	8. Addressee's Address *(ONLY if requested and fee paid)*
6. Signature – Agent X 3-1-89	
7. Date of Delivery	

PS Form **3811**, Mar. 1987 ★ U.S.G.P.O. 1987-178-268 DOMESTIC RETURN RECEIPT

HRE-8J

APR 0 2 1992

Mr. Paul E. Robinson
The Valspar Corporation
1101 Third Street South
Minneapolis, Minnesota 55415

Re: Valspar Corporation
ILD 001 980 135
ILD 052 437 506
IND 005 178 355

Dear Mr. Robinson:

Per your request of August 29, 1991, enclosed please find copies of the Preliminary Assessment/Visual Site Inspection for the referenced facilities.

The executive summary and conclusions and recommendations section have been withheld as enforcement confidential.

If you have any questions, please contact me at (312) 886-4448.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

Enclosures

HRE-8J:FHARRIS:6-2884:4/2/92:MASTER.RES

| OFFICIAL FILE COPY |

CONCURRENCE REQUESTED FROM REB			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
	4/2/92	4-3-92	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HR-12

June 27, 1991

Mr. Bill Smith
Plant Manager
The Valspar Corporation
2500 8th Avenue
East Moline, IL 61244

Re: Visual Site Inspection
Valspar Corporation
(East Moline)
ILD 052 437 506

Dear Mr. Smith:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA). The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern to make a cursory determination of their condition by visual observation. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of units at the facility and the waste management practices used.

The VSI will be conducted on July 15, 1991. The inspection team will consist of Rob Singh and Mike Gorman of Resource Applications, Inc., contractors for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency may also be present.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI. Enclosed is a summary of our current knowledge and data gaps.

If you have any questions, please contact me at (312) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions portion may be made available upon request.

Sincerely yours,

Sheri J Bianchin

for Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Robert Wengrow, IEPA - Rockford
Larry Eastep, IEPA - Springfield

ATTACHMENT

The Valspar Corporation
2500 8th Avenue
East Moline, IL 61244

PROBABLE SOLID WASTE MANAGEMENT UNITS (SWMUs)

1. Please list all waste management units at your facility. If possible, please provide as complete information for the waste unit in response to the questions below.

From the list of probable SWMUs please address the following questions:

- Do the above SWMUs still exist at the facility and are they in operation?
- What are the start-up and closure dates of the above SWMUs?
- What types of wastes are the SWMUs currently/formerly used for?
- Name any SWMUs at your facility that have not been listed above. These would include hazardous waste storage areas, treatment units, or any other area or system at your facility dealing with hazardous waste.

2. Please supply as much information as possible concerning the site history. This would include any information you have regarding any other owner/operators at this location.

3. Please provide a description of the primary processes taking place at your facility and the waste streams which are generated.

4. Describe the methods of treatment and disposal of generated waste utilized by your facility.

If available, the following items are requested:

- A detailed map of the facility showing the location of the SWMUs and production stations.
- Flow diagrams showing waste streams and waste management practices.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

VALSPAR CORPORATION
EAST MOLINE, ILLINOIS
ILD 052 437 506

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 052 437 506
Date Prepared	:	November 13, 1991
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087 IL30
Prepared by	:	Resource Applications, Inc.
Principal Investigator	:	Robert Singh
Telephone No.	:	(312) 332-2230
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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EXECUTIVE SUMMARY

Resource Applications, Inc. (RAI), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Valspar Corporation (Valspar) facility in East Moline, Illinois. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The Valspar facility in East Moline, Illinois is a manufacturer of industrial paints and has been in operation since 1957. The 4.11-acre facility was originally built and operated by Tousey Varnish. After several ownership changes, Valspar took over and has owned and operated the facility since 1970 [Smith, 1991]. Valspar is currently classified as a generator facility, but production ceased at the facility on May 22, 1991 and Valspar is shutting down and trying to sell the site. While the facility was in operation, paint (D001, D008), solvent (F003, F005), and caustic wastes (D002) were generated during the cleaning out of the processing tanks and lines. All wastes were removed from production, stored in 55-gallon drums or pumped to tanker trucks, and treated off-site. The facility is surrounded by a chain link fence; however, the gate is open during business hours. The facility is also monitored by door contacts and motion detectors for added security.

The PA/VSI identified the following 4 SWMUs and 2 AOCs at the facility:

Solid Waste Management Units

1. Hazardous Waste Storage Area
2. Less Than 90-Day Hazardous Waste Storage Area
3. Satellite Waste Accumulation Areas
4. Pigment Storage Room

Areas of Concern

1. Solvent Tank Area
2. Caustic Cleaning Area

The facility has ceased all production. Closure activity for the Hazardous Waste Storage Area (SWMU 1) was completed and approved (RCRA closure certified #P331398388) by IEPA on January 7, 1991.

Although Valspar has ceased production, there is still a potential for release, as Valspar is in the process of cleaning all the processing tanks with sodium hydroxide. The only identified SWMU that is still being used is the Pigment Storage Room (SWMU 4). SWMU 4 and the two AOCs still pose a minimal threat of release to the environment.

During the VSI on July 15, 1991, RAI observed 36 drums of special waste stored in 55-gallon drums in the Pigment Storage Room (SWMU 4). The drums have been there since late April, 1991. Since the wastes consist of off-specification paint and paint scrapings, and the drums are stored inside, on concrete, the potential for release is minimal.

Sodium hydroxide is now the only cleaning agent being used at the facility, and it will be used until all the process tanks and paint containers are cleaned. It is used in the Caustic Cleaning Area (AOC 2), and for the final clean-up of the paint processing tanks. There have been two documented releases from AOC 2 and until the facility is completely shut down, the potential for a hazardous release from the area will remain.

Six 8,000-gallon and two 6,000-gallon solvent tanks rest on the southwest corner of the facility in the Solvent Tank Area (AOC 1). The tanks are now empty, and rest on gravel, in an earthen dike. There has been one documented spill from one of the tanks. Soil sampling of the spill area should be conducted and if contamination is discovered, an appropriate measure should be taken to ensure the health of humans and the environment. A chosen remedy might include ground water monitoring.

During the VSI, RAI concluded that the wastes generated at Valspar were properly managed. The facility is in the process of final shutdown; the potential for a hazardous release to surface water and air is low. There is still a possibility of release from the Solvent Tank Area (AOC 1) and the Caustic Cleaning Area (AOC 2) to soil and ground water. RAI recommends monitoring the final stages of the clean up and shut down of the facility. There will continue to be a potential for release to the environment, until the facility is completely closed.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 team member, provided the necessary assistance to complete the PA/VSI activities for the Valspar Corporation (Valspar).

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading area, or solvent washing areas.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a non-routine or non-systematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Valspar facility in East Moline, Illinois. The PA was completed on July 10, 1991. RAI gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. RAI also reviewed documents from the U.S. Department of Agriculture (USDA), the U.S. Geological Survey (USGS), the Federal Emergency Management Agency (FEMA) and the Illinois State Geological Survey (ISGS). The VSI was conducted on July 15, 1991. It included interviews with Valspar facility representatives and a walk-through inspection of the facility. Four SWMUs and 2 AOCs were identified at the facility.

RAI completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and 14 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C. Ground water monitoring results from the Hazardous Waste Storage Area (SWMU 1) are included in Attachment D.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

Valspar is located at 2500 Eighth Avenue in East Moline, Illinois (Figure 1). East Moline is a small farming community in Rock Island County, at latitude 90° 25' 3" north and longitude 41° 31' 12" west [Valspar, 1980b]. The facility covers 4.11 acres, with the plant occupying approximately 39,000 square feet (Figure 2). The area to the south of the facility contains two separate railroad tracks operated by the Burlington Northern Railroad. To the north-northeast is a residential area. A 4.38-acre vacant lot to the west of the facility is owned by Valspar. The east side consists of marshland, shrubbery, and weeds.

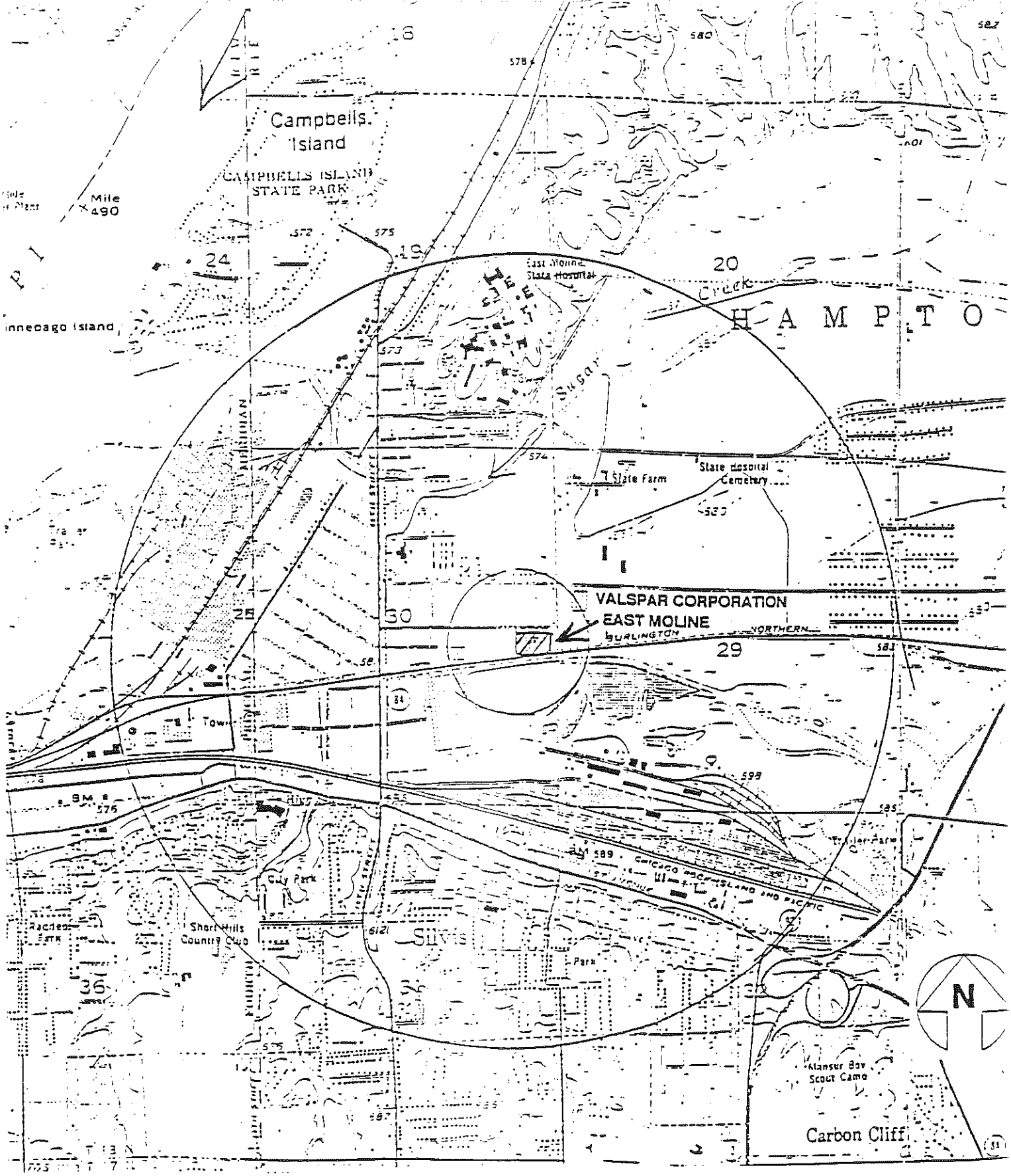
2.2 FACILITY OPERATIONS

Valspar was a paint manufacturer, primarily for farming equipment, that began operations in 1970 and ceased production in May of 1991. The facility was built by Tousey Varnish in 1957. Tousey Varnish operated the facility until 1967, when it was sold to Sun Chemical. One year later, the site was sold to Minnesota Paint, which merged with Valspar in 1970. At present, 11 people are employed at the East Moline facility [Smith, 1991].

From 1970 to May 22, 1991, the facility manufactured and shipped industrial paint in bulk. The paint was primarily ordered by farm equipment companies, including John Deere and Caterpillar, to paint tractors and other equipment. All manufacturing was done on a made-to-order basis [Smith, 1991].

Paint was made from pigment, resin, and other raw materials. The paint pigments and resins went through various mixing and processing procedures within the plant. After production, the paint was put into 55-gallon drums, or larger containers, mainly 350-gallon totes, and stored in Warehouse Two, on the south side of the facility (Figure 2). The bulk paint was kept in the warehouse until it was shipped out.

Wastes streams generated include: 1) solvent/paint waste or off-specification paint (F003, F005, D001, D008); 2) used vibrating bags (D001) from two dust collectors; 3) waste sodium hydroxide (D002) generated from cleaning tanks and totes; and 4) waste oils (D001) generated from servicing forklifts.



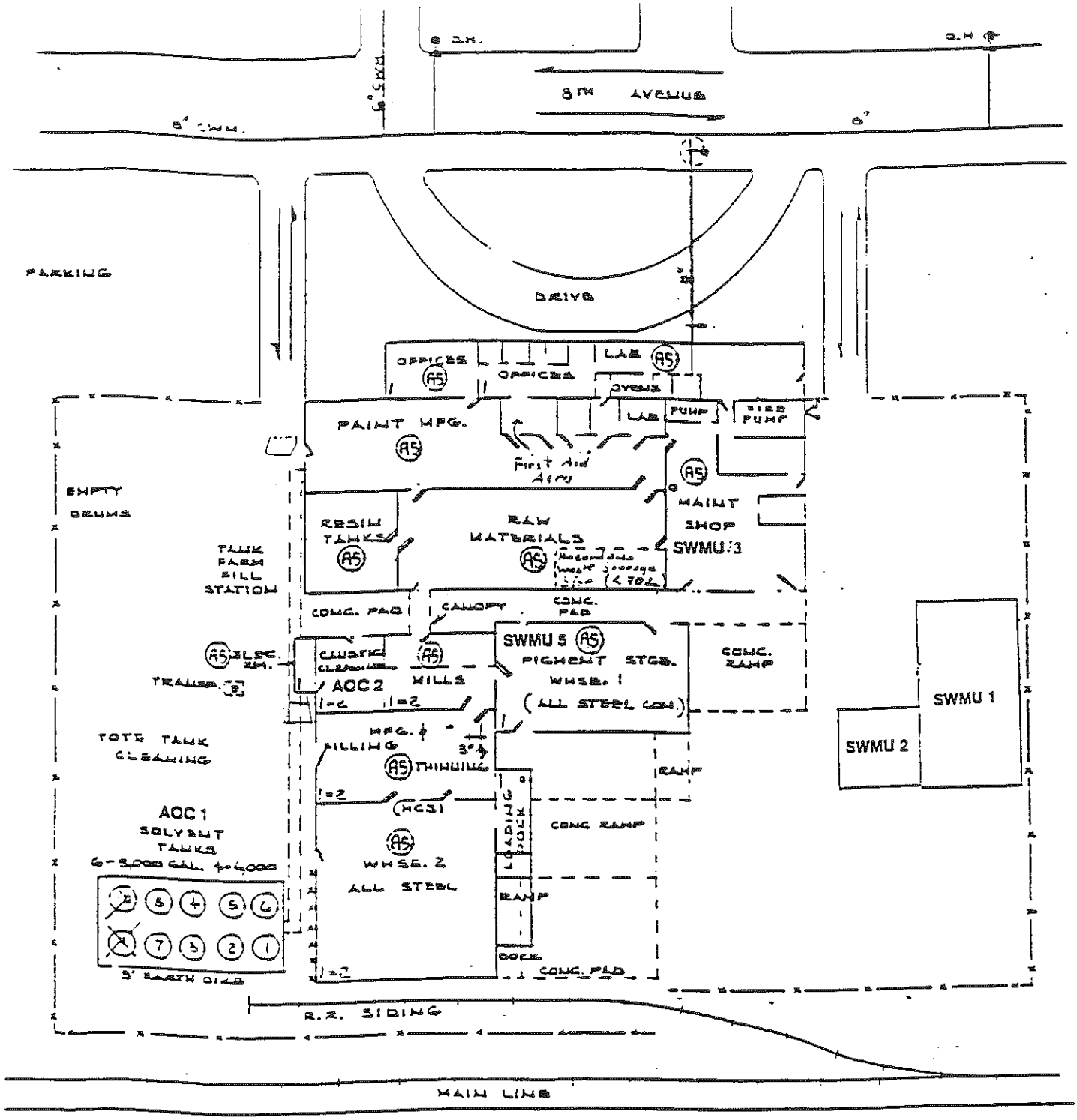
SCALE 1:24 000

1000 0 1000 2000 3000 4000 5000 6000 7000

1 0 1 KILOMETER

CONTOUR INTERVAL 10 FEET
DOTTED LINES REPRESENT 5-FOOT CONTOURS
DATUM IS MEAN SEA LEVEL

VALSPAR CORPORATION EAST MOLINE, ILLINOIS
Figure 1 Facility Location
Source: USGS MAP, 1983 Scale: 1:24.000
Resource Applications, Inc.



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VALSPAR CORPORATION EAST MOLINE, ILLINOIS
Figure 2 Facility Layout (SWMU and AOC Locations)
Source: Valspar, 1991 Scale: 1" = 50'
Resource Applications, Inc.

The solvent/paint waste and off-specification paint were kept in various Satellite Waste Accumulation Areas (SWMU 3) within the facility and transferred by forklift to the Hazardous Waste Storage Areas (SWMUs 1 and 2) within hours of accumulation. Approximately 1,650 gallons per month of this waste was then shipped off-site for fuel blending [IEPA, 1990].

Two dust collectors were used to control pigment dust particles. Fume hoods vented to the dust collectors and the pigment was kept in vibrating bags. Every three months the bags were removed and emptied of collected pigment. The pigment was put back into process, and the bags were drummed with solvent/paint waste.

Sodium hydroxide (NaOH) is used in the Caustic Cleaning Area (AOC 2) to clean out process tanks and customer-returned totes. The sodium hydroxide is not considered waste until it is shipped off-site as such. Over time, the sodium hydroxide becomes too thick (it is mixed with paint sludge) to use through the caustic cleaning valve system and is then removed from the valve system and used to clean out the paint processing tanks. Once one tank is cleaned, the sodium hydroxide is pumped to another tank and reused. Finally, the sodium hydroxide is too thick to use at all and a bulk tanker comes to remove the used caustic solution from the tanks. Approximately 4,500 gallons per year of waste NaOH (D002) is shipped off-site [IEPA, 1990]. The waste sodium hydroxide is a mixture of NaOH, xylene, and paint.

When in operation, the plant serviced its own forklifts in its maintenance shop. At that time, a waste oil/solvent mixture from parts washers was accumulated in drums in a Satellite Waste Accumulation Area (SWMU 3), labeled as D001 (ignitables), and transferred to the Hazardous Waste Storage Areas (SWMUs 1 and 2) for removal. Valspar had manifested their solvent and oil wastes as D001 although it was a solvent/mixture blend (F003, F005). Valspar now has only electric forklifts, has gotten rid of all parts washers, and no longer accumulates wastes in the shop [Smith, 1991].

Table 1 lists the Valspar facility's Solid Waste Management Units (SWMUs).

2.3 WASTE GENERATING PROCESSES

Most hazardous waste produced at the facility came from the cleaning of: (1) processing tanks; (2) processing lines; and (3) customer-returned paint containers. The only other wastes consisted of off-specification paint, waste oil/solvent (xylene) from parts washers and forklift service, and used vibrating bags from the dust collectors.

TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMUs)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Hazardous Waste Storage Area	Yes	Closed, closure certified Jan. 7, 1991
2	Less Than 90-Day Hazardous Waste Storage Area	No	Inactive
3	Satellite Waste Accumulation Areas	No	Inactive
4	Pigment Storage Room	Yes	Active, greater than 90 day storage

* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B permit.

Solvent/paint (from cleaning process tanks and lines) waste has not been generated since the facility ceased production, but was generated during cleaning procedures when toluene and xylene, in 100 percent pure concentrations, were pumped through the processing lines and sprayed into processing tanks. Xylene became the exclusive solvent in July 1988 because the flashpoint of toluene was too low and Valspar wanted to avoid the hazards associated with it. The solvent/paint waste was pumped into 55-gallon drums using portable pumps, put into Satellite Waste Accumulation Areas (SWMU 3) within the plant, and then removed to the Hazardous Waste Storage Areas (SWMUs 1 and 2). Approximately 1,650 gallons per month of the waste was then taken by Mr. Frank, Inc. (EPA ID #ILD069506160) to American Chemical Service (EPA ID #IND016360265) and EWR (EPA ID #ILD082157251) for fuel blending [IEPA, 1990].

The sodium hydroxide (NaOH) waste was, and still is generated from the cleaning of processing tanks and customer-returned paint containers. These containers generally are lined with thick, dried paint residues which require a caustic solution to clean them. Valspar provided paint in 350-gallon totes which were returned when the customer had exhausted the paint. Empty totes are brought, one at a time, by forklift to the Caustic Cleaning Area (AOC 2), turned upside down, and cleaned. First, sodium hydroxide from a heated vat is sprayed into the tote; the spray falls to the floor and goes into a concrete floor sump with a pump which pumps the sodium hydroxide back to the vat through overhead pipes. Second, an automatic valve shuts off the sodium hydroxide flow and 10 to 15 gallons of city water rinse the tank. A drain is opened automatically, and the wash water flows by gravity to a sump. The sump empties into the city sanitary sewer. Over time, the sodium hydroxide becomes too thick and cannot be used in the Caustic Cleaning Area (AOC 2). The used sodium hydroxide is then used as a cleaner for the paint processing tanks, because the solvent cleaning of the processing tanks is not always strong enough to clean the tanks. The sodium hydroxide is left in a tank for a day or two to allow the caustic to thoroughly clean the sides of the tank. The sodium hydroxide is then pumped from tank to tank until it becomes too thick to pump. Approximately 4,500 gallons per year were pumped out of the process tanks, directly to a tanker truck, and shipped to Chem Clear (EPA ID #ILD000608471) for disposal. In 1990, only 2,300 gallons were removed for disposal at Clean Harbor of Chicago (EPA ID #ILD052437506). The sodium hydroxide is never considered waste until it is shipped off-site [IEPA, 1990].

Off-specification paint, waste oils, and vibrating bags from the dust collectors were the only other wastes generated at the facility. Off-specification paint was drummed, labeled as D001 waste, put into the Satellite Waste Accumulation Areas (SWMU 3), and then transferred to the Hazardous Waste Storage Areas (SWMUs 1 and 2). Waste oil/solvent from the parts washers and forklifts was drummed and kept in a Satellite Waste Accumulation Area (SWMU 3) in the maintenance shop. The waste oil was labeled as D001 (ignitable) waste and removed to the Hazardous Waste Storage Areas (SWMUs 1 and 2). Every

three months the vibrating bags were removed from the dust collectors and emptied of pigment dust. The pigment was put back into process, and the bags were drummed with off-specification paint. Off-specification paint, waste oils, and used vibrating bags were included in the solvent/paint waste that was shipped off-site for disposal [Smith, 1991].

Table 2 lists the solid wastes, and the units that managed the wastes, for the Valspar facility.

2.4 RELEASE HISTORY

Valspar was notified of a complaint in November 1980 that a pump on the south side of the facility was pumping liquid off-site, through the facility fence [IEPA, 1980]. At the time, Plant Manager Timothy Jones stated that the liquid was just water. It is unclear what remedial action, if any, was taken by Valspar personnel. IEPA has no records regarding response to this incident, and during the VSI, Valspar officials expressed no knowledge of the incident [Smith, 1991].

During the closure of the Hazardous Waste Storage Area (SWMU 1), on-site soil was found to be contaminated. Soil contamination was visibly evident when the concrete pad was torn up and removed. Soil samples were taken inside and around the excavated area and contamination was found to extend to the water table. Approximately 9,000 cubic feet of soil were removed, manifested as D008 waste, and disposed of at the Peoria Disposal Company. Valspar was required to monitor ground water for 32 weeks, from October 1989 to June 1990. No ground water contamination was demonstrated by the data (see Attachment D).

In May 1985, there was a corrosive liquid spill caused by a valve failure in the Caustic Cleaning Area (AOC 2). Fifty gallons of spent 10% NaOH cleaning solution (NaOH, water, paint, and xylene) overflowed out the door and onto a concrete pad to the west of the building. The spill was contained within the limits of Valspar-owned property and did not migrate to on-site soils. After an initial pH reading of the spill of 12.0 - 14.0, the entire area was neutralized with sodium bisulfate to bring the pH of the spill down to 7.0. Standing water was pumped and removed to a treatment facility. IEPA and the East Moline Fire Department were notified and inspections were performed. No further testing of the area was required and the matter was considered resolved [Valspar, 1985b].

In April 1987, an automatic valve malfunction in the Caustic Cleaning Area (AOC 2), led to a release of between 60 and 75 gallons of 10% NaOH water solution to the city sanitary sewer system. The East Moline City Department of Public Works Sewage Treatment Plant Chemist, Steve Vernig, was called

TABLE 2

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit
Solvent/Paint Waste/D001, D008, F003, F005	Cleaning of Processing Tanks and Lines	SWMU Nos. 1, 2, 3, 4
Waste Sodium Hydroxide/D002	Cleaning of Paint Tanks	Removed directly from process
Off-specification paint/D001	Manufacturing Error	SWMU Nos. 1, 2, 3
Oil/Solvent Waste/F003, F005; manifested as D001	Cleaning of Forklifts and Tools	SWMU Nos. 1, 2, 3
Used Vibrating Bags/D001	Dust Collectors	SWMU Nos. 1, 2

immediately and advised flushing the sewer with additional water. Approximately 250 gallons of water were pumped into the system which was then shut down until the valve was replaced [Valspar, 1987].

In December 1988, a leak from a valve on one of the Solvent Tank Area (AOC 1) released 320 gallons of aromatic hydrocarbon petroleum distillate 150, (Trade Name: Hi Sol 15) into the gravel and earthen dike surrounding the tank. IEPA and the fire department were notified and the spill area was foamed with Ansulite 6% and sprayed with 350 gallons of water to minimize flammability risk [Valspar, 1988].

On April 25, 1989, after unloading 2,000 pounds of P4-600B (Heubach's Chrome Yellow Light Y933LD), a Caretta Trucking Company truck pulled away from Valspar property. The driver stopped to sweep approximately 15 to 20 pounds of residual dry pigment out of the truck's trailer and onto the street. Valspar officials observed the act in progress and immediately instructed the driver to stop sweeping out the product. Plant Manager Bill Smith called Heubach and Caretta's Safety Department. Valspar used two 100-pound boxes of dust sweep compound, 15 gallons of mineral spirits, and 4 man-hours to clean up the spill. The pigment waste was put into a drum, sealed, labeled, and removed by the carrier. The East Moline Fire Department was notified and approved of the handling of the situation [Valspar, 1989].

2.5 REGULATORY HISTORY

On August 15, 1980, Valspar filed a Notification of Hazardous Waste Activity designating the company as a hazardous waste generator and treatment/storage/disposal facility [Valspar, 1980a]. This notification included the description of hazardous wastes involved in this activity as follows: F003, F005 (Non-Specific Source Hazardous Waste); K078, K079, K080, K082 (Specific Sources Hazardous Waste); U112, U140, U154, U159, U220, U239 (Commercial Chemical Product Hazardous Wastes); corrosive and toxic (Non-Listed Hazardous Waste). On October 7, 1980, Valspar filed a second Notification of Hazardous Waste Activity [Valspar, 1980b]. Valspar removed all hazardous waste description codes except K078, K079, K080, and K082. On October 7, 1980 a RCRA Part A Permit application was filed stating that 80,000 pounds of K078 waste; 40,000 pounds of K079 waste; 4,000 pounds of K080 waste; 500 pounds of K082 waste; 8,000 pounds of D001 waste; and 2,000 pounds of D008 waste were generated and stored in drums (S01) for disposal per year [Valspar, 1980c]. EPA verified Valspar's Hazardous Waste activity on September 28, 1981 [EPA, 1981]. On August 12, 1982 EPA notified Valspar that waste from painting operations and paint production with Hazardous Waste codes K078, K079, K080, and K082 had been suspended from regulation pending further study [EPA, 1982]. EPA requested Valspar to submit an amended Part A Permit

application to remove these K-wastes. An amended Part A Permit application was filed on October 1, 1982 stating that 128,500 pounds of D001 waste; 4,000 pounds of D002 waste; and 2,000 pounds of D008 wastes were generated and stored in drums (S01) for disposal per year [Valspar, 1982]. EPA acknowledged Interim Status for the Valspar facility on August 9, 1983 [EPA, 1983]. In June 1985, Valspar requested a withdrawal of its Part A Permit because they found that 90-day storage was adequate for its needs [Valspar, 1985a]. Valspar did not manifest solvent/waste as F003 or F005 until 1989. All oil and solvent waste was manifested and considered by Valspar to be D001 hazardous waste, although it was a solvent/mixture blend (F003, F005) [Smith, 1991]. Valspar submitted a closure plan for the Hazardous Waste Storage Area (SWMU 1), and after multiple modifications, completed closure of the unit on January 7, 1991 [IEPA, 1991a].

Valspar has been found out of compliance with RCRA regulations during several Compliance Evaluation Inspections conducted by the state. A Compliance Inquiry Letter (CIL) was sent to Valspar after each inspection.

In May 1987, IEPA sent a CIL to Valspar for improper waste determination, not having a written inspection schedule, not having a written operating record, and not having records available upon request during an inspection. Valspar corrected the violations, sent a response letter to IEPA, and the issue was considered resolved [IEPA, 1987].

In January 1989, an IEPA CIL was sent to Valspar for the same violations as in May 1987 as well as for storage of hazardous waste that was not specified in Valspar's RCRA Part A Permit application. Valspar corrected the violations, sent a response letter to IEPA, and the issue was considered resolved [IEPA, 1989].

In January 1991, an IEPA CIL was sent to Valspar for improper labeling of stored waste and not having certain documents, such as written job descriptions, training documents, and job titles for each hazardous waste worker. Valspar corrected the violations, sent a response letter to IEPA, and the issue was considered resolved [IEPA, 1991b].

A National Pollutant Discharge Elimination Survey (NPDES) permit was issued to the facility for the release of non-contact cooling water from the facility's sandmills. However, Permit #IL0003255 was terminated on September 27, 1985 and the cooling water was subsequently discharged to the city sanitary sewer. Valspar has a General Industrial Sewer Use Permit, issued by the city of East Moline, to discharge wastewater from the facility to the city sanitary sewer system (Permit #G-88-86-14, effective November 1,

1988 to November 1, 1993). Valspar must sample and monitor discharge and submit results to the city of East Moline every 3 months. Valspar has an air permit to operate its two dust collectors, which is currently unnecessary because all production has ceased. The facility will let the permit expire. There is no record of violations of air regulations.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Valspar Corporation facility.

2.6.1 Climate

The site is situated in East Moline, Rock Island County, Illinois, the location of a U.S. National Weather Service Office. With no significant topographical barriers to the airmass flow, climate in the area is typically continental with cold winters, warm summers, and frequent short periodic fluctuations in temperature, humidity, cloudiness, and wind direction [Ruffner and Bair, 1985]. The average daily temperature is 49.5°F. The lowest average daily minimum temperature is 11°F in January. The highest average maximum temperature is 87.1°F in July. The prevailing wind direction is west-northwest and the average wind speed is 10 miles per hour. The average annual precipitation as a water equivalent is 35.73 inches. The annual net precipitation is approximately 2.1 inches. In winter, about one half of the precipitation, or about 10 percent of the annual total, falls as snow. During the fall, winter, and spring, the pattern of precipitation tends to be more uniform over both time and space, whereas in summer rainfall is often locally heavy and variable. The one year, 24-hour maximum rainfall recorded in the area over the last 25 years is 6.29 inches [Ruffner and Bair, 1985].

2.6.2 Flood Plain and Surface Water

The general direction of surface flow from the site is toward the north-northwest into Sugar Creek about one-half mile away. Sugar Creek, in turn, flows into the Mississippi River one-half mile farther downstream. Buildings and other structures hinder the surface flow and the drainage is largely through sewers. With a slope away from the site of only 10 feet over one-half mile, the site is poorly drained. At an elevation of 580 feet above sea level, the site is located in the drainage basin of the Mississippi River [USDA, 1979].

2.6.3 Geology and Soils

The surrounding urban environment precludes easy identification of the underlying soils. Soils in the vicinity have a high seepage potential with medium to low permeability and are subject to flooding. The soil types underlying the facility are Sawmill silty clay loam (wet) and the Wabash silty clay [USDA, 1979].

The Sawmill silty clay loam (wet) soil type mostly occurs in nearly level areas that lack natural drainage outlets. In some places it is in long and narrow sloughs. This soil has a permanent high water table, and ponding is a hazard. The organic matter content is high. The soil has moderate to moderately slow permeability and very high available water capacity.

The Wabash silty clay soil occurs in nearly level areas within broad flood plains. The water table is frequently high, and flooding can be a hazard on unprotected bottom lands. The soil has a high organic matter content and has very slow permeability and moderate available water capacity [USDA, 1979].

The exposed rocks of Rock Island County can be conveniently classified as either bedrock (mainly dolomite, limestone, and shale) or unconsolidated deposits (glacial deposits, river deposits, and loess). The bedrock consists of sedimentary strata of Paleozoic age which underlie the unconsolidated deposits of Quaternary age. Because the bedrock is a great deal older than the unconsolidated deposits and was extensively eroded prior to the deposition of the latter, the contact between them is irregular, in places exposed at the surface and in other places deeply buried.

The bedrock of Rock Island County consists of about 4,000 feet of sedimentary rock, ranging in age from Cambrian to Pennsylvanian, lying on granitic rock of Precambrian age. At the base of the sedimentary section, sandstone predominates; almost 1,900 feet of sandstone occurs between the base of the Mt. Simon Sandstone and the top of the Franconia Formation. Dolomite and limestone make up the bulk of the next 1,800 feet, from the base of the Potosi Dolomite to the top of the Devonian System. Within this interval, however, are several sandstones, the most important of which is the St. Peter, a significant source of ground water. In addition, shale of the Maquoketa Group occurs near the top of the dolomite-limestone sequence. The shale is relatively impermeable and restricts the vertical movement of liquids and gases. The Racine Formation (Silurian System) is the oldest rock exposed at the surface in Rock Island County. It consists of brownish-yellow to gray, porous, crystalline dolomite, and occurs in beds ranging in thickness from a few inches to several feet [Anderson 1980].

2.6.4 Ground Water

Ground water flow in the area is in the north-northwest direction. Geological conditions controlling the availability of ground water in the northern part of western Illinois are generally favorable for domestic water supplies, but range from unfavorable to very favorable for large municipal and industrial supplies. Ground water, at a depth of about four feet, near the site may be obtained for domestic and farm supplies from sand and gravel deposits ranging in thickness from 50 to 105 feet. However, the possibilities of sufficient supplies of water for industrial and municipal purposes are poor to fair. The Silurian dolomite which is reached at depths ranging from 100 to 400 feet is the main source of industrial ground water supplies in the southeast part of Rock Island County. Water-filled fractures are most likely to occur in the upper 125 feet of the dolomite, but the lower part is commonly "tight." Devonian limestone-dolomite, which attains a maximum thickness of almost 200 feet in the county, is usually tight and not water-yielding.

Ground water for many municipalities and industries in northern Illinois is obtained from deep sandstone aquifers: the Ironton-Galesville and the Glenwood-St. Peter. The latter is less uniform in thickness and permeability than the former, but is about 1,000 feet nearer the surface. The quality of the water in both aquifers becomes poorer as the aquifer deepens [Bergstrom, 1956]. The Mississippi River serves as the water source for Rock Island-Moline and East Moline, and the smaller towns are supplied by wells pumping from Silurian dolomite at depths of 100 to 400 feet [USDA, 1979].

The important aquifers are sand and gravel, sandstone, limestone, and dolomite. Sand and gravel deposits in Rock Island County range in thickness from a few inches to hundreds of feet. Deposits a few feet or more thick are often suitable aquifers for drilled wells.

The major sandstone aquifers in Rock Island County, the Glenwood-St. Peter and Ironton-Galesville sandstones, are thick, well sorted, and loosely cemented, and they are widely used as sources of municipal and industrial supplies. Fine-grained, poorly sorted, well cemented sandstones occur at shallow depths in the Pennsylvanian formations in most of the area. The Keokuk-Burlington limestone and the Silurian dolomite are well creviced at most places where they occur in the region and are usually a dependable source of ground water for farm supplies [Bergstrom, 1956].

2.7 RECEPTORS

The facility is located in a rural area of East Moline, population 21,000. Residential areas are located directly across the street from the facility to the north. The facility is fenced and has controlled

entry. The possibility of direct public contact with hazardous wastes is minimal. Surface water drainage is through storm sewers. The facility obtains its water from the East Moline city supply system which gets its water from the Mississippi River. The nearest public water supply well in the area is upgradient, at a distance of approximately 4,000 feet south-southeast of the facility. The depth of wells ranges from 440 to 560 feet in the area. Public contact with contaminated ground water from the facility is possible, but due to the nature of the wastes and facility controls, it is unlikely.

Wetlands exist about one mile to the west. The ground water flow is in a north-northwesterly direction into the Mississippi River through Sugar Creek, which is the nearest surface water body, half a mile away. The PA/VSI determined that wetlands, Sugar Creek, and residential areas are the only sensitive environments within 2 miles of the facility and there are no habitats of endangered species within 2 miles.

There have been two reported spills from the Caustic Cleaning Area (AOC 2), and a leak from one of the Solvent Tank Area (AOC 1) but no injuries or contamination have been documented as a result of the spills.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 4 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of release, and RAI observations.

SWMU 1	**Hazardous Waste Storage Area**
Unit Description:	This unit was a 70' X 40' concrete pad on which drums of D001, D008, F003, and F005 hazardous waste were stored prior to removal. It was located outside, on the east side of the facility. Access to the unit was unrestricted (see Figure 2 and photo 6). The unit has been formally RCRA closed and ground water monitoring showed no signs of contamination (see Attachment D).
Date of Startup:	1970
Date of Closure:	Inactive since 1989. Closure completed January 7, 1991.
Wastes Managed:	This unit managed 1,650 gallons per month of spent solvents, ignitables, waste oils, waste paint, and used vibrating bags (D001, D008, F003, F005).
Release Controls:	The pad was made of concrete but did not have any secondary containment.
History of Release:	During closure, the soil under and around the concrete pad was found to be contaminated. Nine thousand cubic feet of soil was manifested as D008 hazardous waste, removed and disposed of off-site. Subsequent ground water monitoring revealed no further contamination.
Observations:	At the time of the inspection the pad had been torn up and plugged monitoring well holes could be seen. No drums remained in the area.
SWMU 2	**Less Than 90-Day Hazardous Waste Storage Area**
Unit Description:	This unit was a 30' X 40' concrete pad which was used to store the

hazardous waste drums (that had previously been stored in SWMU 1) for less than 90 days, after SWMU 1 was closed. The unit was outside, directly adjacent to the location of SWMU 1. Access to the unit was unrestricted (see Figure 2 and photo 7).

Date of Startup: 1989

Date of Closure: This unit has not been used since production ceased in May 1991.

Wastes Managed: This unit managed 1,650 gallons per month of spent solvents, ignitables, waste oils, waste paint, and used vibrating bags (D001, D008, F003, F005).

Release Controls: The unit was an open area on in the east side of the facility with no barriers to access. The pad did not have any secondary containment.

History of Release: No releases have been documented from this unit.

Observations: The pad area is no longer used, but appeared sound and there was no visual evidence of release. There are no drums remaining in the area.

SWMU 3 **Satellite Waste Accumulation Areas**

Unit Description: These units were temporary drum storage areas, indoors, within the production area and in the maintenance shop. Access to them was unrestricted. The number of units varied from as many as 6 being used at one time in the production area, and 1 in the maintenance shop. Only one or two drums were stored in each area, for no more than a few hours, before being removed outside to the Hazardous Waste Storage Areas (SWMUs 1 and 2).

Date of Startup: 1970

Date of Closure: These units have not been used since production ceased in May 1991.

Wastes Managed: These units managed waste oil/solvent, spent solvents, ignitables, and waste paint (D001, D008, F003, F005).

Release Controls: The units were indoors, on concrete, but did not have any secondary containment.

History of Release: No releases have been documented from these units.

Observations: At the time of the inspection, production had ended and there were no drums on site. The facility now uses electric fork lifts and no longer has any parts washers on site. The concrete floors appeared sound and there was no visual evidence that a release had ever occurred in a satellite area.

SWMU 4 **Pigment Storage Room**

Unit Description: The room was used as a raw pigment product warehouse, but is now storing 36 drums of special waste. The waste is being analyzed by Beling Consultants to identify the specific constituents of the waste. The drums had been in the room since late April 1991 and were to be removed upon receipt of the lab results (see Figure 2 and photos 1, 2, and 3).

Date of Startup: 1970

Date of Closure: Still active.

Wastes Managed: This unit is managing 36 drums of special wastes, which include paint scrapings and off specification paint (D001, D008).

Release Controls: The floor was made of concrete, but there is no form of secondary containment.

History of Release: No releases have been documented from this unit.

Observations: The room has only recently been used for storage. With the final shut-down in progress, Valspar is using the room as a storage area until final facility shut down. The wastes had been stored there since late April 1991 (greater than 90 days). There was no visual evidence that a release had ever occurred in the unit.

4.0 AREAS OF CONCERN

RAI identified 2 AOCs during the PA/VSI. These are discussed below.

AOC 1 **Solvent Tank Area**

Eight steel, solvent tanks, with volumes of 6,000 gallons or greater, rest on an outdoor gravel pad (see photo 10). The tanks had held xylene, toluene, mineral spirits, naphthalene, and ethyl benzene (primarily xylene). The only secondary containment is a 5-foot earthen dike. A release was documented and occurred due to a valve failure (see section 2.4 for details) and there has never been any ground water monitoring or soil testing of the surrounding area. This is an AOC because of the past release and because the tanks appear old and weather-beaten and therefore, there is the possibility that an underground leak may have occurred.

AOC 2 **Caustic Cleaning Area**

This is a closed room that houses a heated, steel 4,000-gallon sodium hydroxide vat that is used to clean customer-returned totes. This area is still active. Sodium hydroxide is sprayed into the tote, collected in a concrete sump on the floor, and pumped back into the vat. An automatic water rinse of 15 to 20 gallons follows the sodium hydroxide spray. The waste water is released to the sanitary sewer. This area has had two documented releases of spent sodium hydroxide cleaning solution (a mixture of NaOH, water, xylene, and paint) related to faulty valves and will continue to be a potential source of contamination until the facility is completely closed (see photos 8 and 9).

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 4 SWMUs and 2 AOCs at the Valspar facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, release history, and observed condition, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU and AOC. Table 3 identifies the SWMUs and AOCs at the Valspar facility and suggested further actions.

SWMU 1 **Hazardous Waste Storage Area**

Conclusions: This unit is no longer active. During closure, the concrete pad was removed and soil was visibly contaminated. Soil samples were taken and revealed lead contamination. Approximately 9,000 cubic feet of contaminated soil was removed. Ground water monitoring was performed for the surrounding area from October 1989 to June 1990. It is unclear at what depth the screens were set. Based on 32 weeks of sampling, Weston Consultants found no ground water contamination (see Attachment D). The potential for release via various pathways is summarized below:

Ground water: Low. The unit has been closed and monitoring wells found no sign of contamination.

Surface water: Low. The unit has been closed and monitoring wells found no sign of contamination.

On-Site Soil: Low. The unit has been closed, soil samples after 9,000 cubic feet of contaminated soil were removed showed no sign of contamination.

Air: Low. The unit has been closed and there was no sign of contamination.

Recommendations: No further action is recommended at this time.

TABLE 3

SWMU and AOC SUMMARY

SWMU	Operational Dates	Evidence of Release	Suggested Further Action
1. Hazardous Waste Storage Area	1970 to 1989	Contaminated soil was removed	No further action at this time.
2. Less Than 90-Day Hazardous Waste Storage Area	1989 to 1991	None	No further action at this time.
3. Satellite Waste Accumulation Areas	1970 to 1991	None	No further action at this time.
4. Pigment Storage Room	1970 to present	None	Remove special waste.

AOC	Operational Dates	Evidence of Release	Suggested Further Action
1. Solvent Tank Area	1970 to 1991	Documented release in 1988	Sample surrounding soil and if contaminated, proceed with ground water monitoring.
2. Caustic Cleaning Area	1970 to present	Documented releases in 1985 and 1987	Inspect automatic valve system for leaks through the concrete sump and process lines until facility is closed.

SWMU 2 **Less Than 90-Day Hazardous Waste Storage Area**

Conclusions: This unit is no longer active. The potential for release via various pathways is summarized below:

Ground water: None. The unit is no longer used and there is no visual sign of contamination.

Surface water: None. The unit is no longer used and there is no visual sign of contamination.

On-Site Soil: None. The unit is no longer used and there is no visual sign of contamination.

Air: None. The unit is no longer used and there is no sign of contamination.

Recommendations: No further action is recommended at this time.

SWMU 3 **Satellite Waste Accumulation Areas**

Conclusions: These units are no longer active. The potential for release via various pathways is summarized below:

Ground water: None. The units are no longer active and there is no sign of contamination. The units were inside, on concrete, and any release that may have occurred would have been contained within the facility.

Surface water: None. The units are no longer active and there is no sign of contamination. The units were inside, on concrete, and any release that may have occurred would have been contained within the facility.

On-Site Soil: None. The units are no longer active and there is no sign of contamination. The units were inside, on concrete, and any release that may have occurred would have been contained within the facility.

Air: None. The units are no longer active and there is no sign of contamination. The units were inside and any release that may have occurred would have been contained within the facility.

Recommendations: No further action is recommended at this time.

SWMU 4 **Pigment Storage Room**

Conclusions: This unit is currently active. Presently it is storing 36 drums of special waste. The waste is being analyzed by Beling Consultants to identify the specific constituents. The potential for release via various pathways is summarized below:

Ground water: Low. The unit is located inside with sound concrete flooring. If a release were to occur, it would be contained before reaching the ground water.

Surface water: Low. The unit is located inside with sound concrete flooring. If a release were to occur, it would be contained before reaching the surface water.

On-Site Soil: Low. The unit is located inside with sound concrete flooring. If a release were to occur, it would be contained before reaching on-site soil.

Air: Low. The unit is located inside, in any release would be contained within the facility.

Recommendations: Remove the special waste as soon as the testing results are received.

AOC 1 **Solvent Tank Area**

Conclusions: The tanks appear worn but are empty. The tanks are housed on gravel with an earthen dike. A leak has occurred and may have contaminated ground water and/or soil.

Recommendations: Sample surrounding soil. If contamination is discovered, install monitoring wells and monitor ground water.

AOC 2 **Caustic Cleaning Area**

Conclusions: The primary containment appears sound, but there is a potential for release. Large volumes of a sodium hydroxide mixture are used in the area. The automatic valve of the cleaning cycle has malfunctioned in the past and could fail again.

Recommendations: Until facility closure, monitor and inspect the concrete sump, valves, and piping in the area for leaks.

REFERENCES

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IEPA, 1991b. Compliance Inquiry Letter (CIL), Certification #P367387149, January 15.

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Valspar, 1980a. Notification of Hazardous Waste Activity, August 15.

Valspar, 1980b. Revised Notification of Hazardous Waste Activity, October 7.

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Valspar, 1989. Spill Report Filed by Bill Smith, May 5.

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ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 052 437 506

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER				
The Valspar Corporation	2500 8th Avenue				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
East Moline	IL	61244	Rock Island		
09 COORDINATES: LATITUDE	**LONGITUDE**				
90 25 03.N	41 31 12.W				

10 DIRECTIONS TO SITE *(Starting from nearest public road)*

Take 88 from Chicago to Quad City Downs. Turn right at Quad City Downs. Go about 1 mile into an industrial park. Turn left at the Johnson Building (large, orange building). Go half a mile and facility is on the left.

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*		
The Valspar Corporation	1101 3rd Street South		
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**
Minneapolis	MN	55415	(612) 332-7371
07 OPERATOR *(if known and different from owner)*	**08 STREET *(Business, mailing, residential)***		
The Valspar Corporation	2500 8th Avenue		
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**
East Moline	IL	61244	(309) 752-1450

13 TYPE OF OWNERSHIP *(Check one)*

☒ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER _____ *(Specify)* ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*

☒ A. RCRA 3010 DATE RECEIVED: 11 / 18 / 80 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: / / (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

☒ YES DATE 07 /15 /91 ☐ NO

BY *(Check all that apply)*

☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR ☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*

CONTRACTOR NAME(S): Resource Applications, Inc.

02 SITE STATUS *(Check one)*

☒ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION

1957 (BEGINNING YEAR) | Present (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Sodium hydroxide, xylene, toluene, aromatic solvent 150, barium, mineral spirits, zinc chromate, ethyl benzene, isophorone, methyl amyl ketone, methyl propyl ketone, trichbooethane, triethyllamine, napthe.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Site is located in rural area. Ground water in the area may be contaminated from solvent tank farm on site, and from a sump located in the Caustic Cleaning Area of the facility; however, the potential for contamination is low.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ☒ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
Robert Singh		Resource Applications, Inc.	(312) 332-2230	08 / 28/ 91 (MONTH DAY YEAR)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
IL	ILD 052 437 506

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES *(Check all that apply)*

- ☒ A. SOLID
- ☐ B. POWDER, FINES
- ☒ C. SLUDGE
- ☐ D. OTHER _____ *(Specify)*
- ☐ E. SLURRY
- ☒ F. LIQUID
- ☐ G. GAS

02 WASTE QUANTITY AT SITE *(Measures of waste quantities must be independent)*

TON _____

CUBIC YARDS _____

NO. OF DRUMS 45

03 WASTE CHARACTERISTICS *(Check all that apply)*

- ☒ A. TOXIC
- ☐ B. CORROSIVE
- ☐ C. RADIOACTIVE
- ☐ D. PERSISTENT
- ☐ E. SOLUBLE
- ☐ F. INFECTIOUS
- ☒ G. FLAMMABLE
- ☒ H. IGNITABLE
- ☐ I. HIGHLY VOLATILE
- ☐ J. EXPLOSIVE
- ☐ K. REACTIVE
- ☐ L. INCOMPATIBLE
- ☐ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	4,500	gal/yr	sodium hydroxide waste
OLW	OILY WASTE			
SOL	SOLVENTS	1,650	gal/mo	solvent/paint mixture
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES *(See Appendix for most frequently cited CAS Numbers)*

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
	sodium hydroxide	1924-60	removed from process/off site	Unknown	
	xylene	1330-20-7	drum/removed off-site	Unknown	
	toluene	108-88-3	drum/removed off-site	Unknown	
	aromatic solvent 150	-	drum/removed off-site	Unknown	
	mineral spirits (solvent)	-	drum/removed off-site	Unknown	
	zinc chromate	-	drum/removed off-site	Unknown	
	ethyl benzene	1175-26	drum/removed off-site	Unknown	
	naptha	2553-27	drum/removed off-site	Unknown	

V. FEEDSTOCKS *(See Appendix for CAS Numbers)*

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

Smith, 1991. Conversation Between Bill Smith (Valspar) and Rob Singh and Mike Gorman (RAI Inspection Team), July 15.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
IL	ILD 052 437 506

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ☒ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

Low potential for release to ground water. All production operations have ceased and the facility is going through final closure.

01 ☐ B. SURFACE WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ☒ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

Low potential for release of surface water. All production operations have ceased and the facility is going through final closure.

01 ☐ C. CONTAMINATION OF AIR — 02 ☐ OBSERVED (DATE: _____) — ☒ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

Low potential for release of air. All production operations have ceased and the facility is going through final closure.

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS — 02 ☐ OBSERVED (DATE: _____) — ☒ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

Low potential for fire. Paint waste is flammable but is no longer generated.

01 ☐ E. DIRECT CONTACT — 02 ☐ OBSERVED (DATE: _____) — ☒ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

Low potential for direct contact. All operations are located inside a building that is locked after hours.

01 ☒ F. CONTAMINATION OF SOIL — 02 ☒ OBSERVED (DATE: 1989) — ☐ POTENTIAL — ☐ ALLEGED

03 AREA POTENTIALLY AFFECTED: _____ (Acres) — 04 NARRATIVE DESCRIPTION

Approximately 9,000 cubic feet of soil was removed when the Hazardous Waste Storage Area was removed.

01 ☐ G. DRINKING WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None identified.

01 ☐ H. WORKER EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) — ☒ POTENTIAL — ☐ ALLEGED

03 WORKERS POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

Employees work near sodium hydroxide that could irritate skin.

01 ☐ I. POPULATION EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) — ☒ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

Low potential for exposure/injury. All operations are located inside a building that is locked after hours.

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

The Valspar Corporation
East Moline, Illinois
ILD 052 437 506

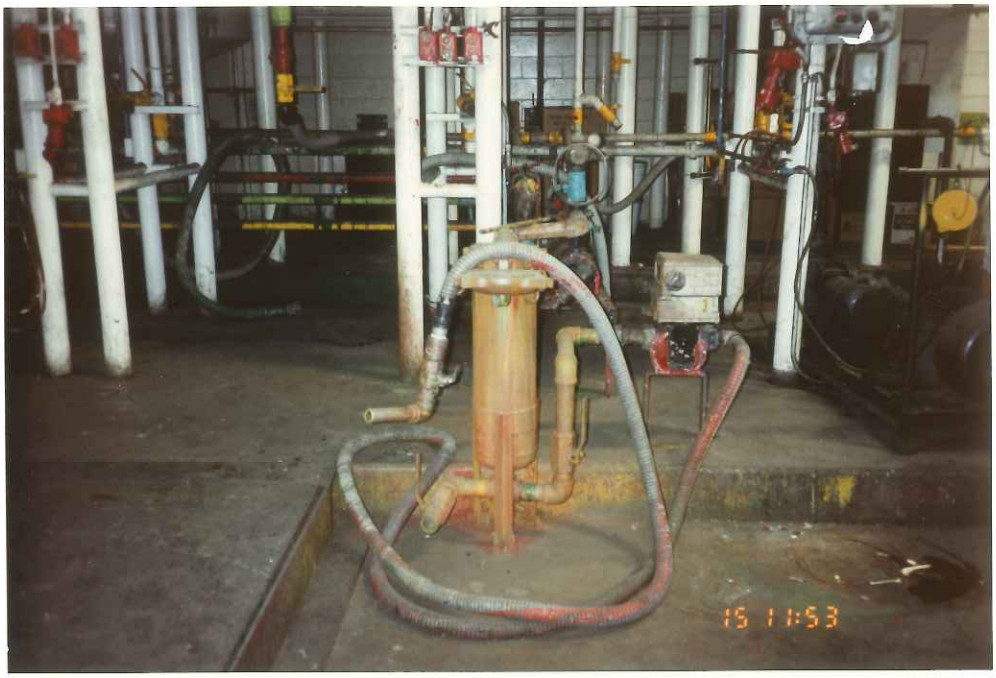
Date:	July 15, 1991
Facility Representatives:	Bill Smith, The Valspar Corporation Paul Robinson, The Valspar Corporation
Inspection Team:	Robert Singh, Resource Applications, Inc. Michael Gorman, Resource Applications, Inc.
Photographer:	Michael Gorman
Weather Conditions:	Sunny, Temperature 85° F
Summary of Activities:	RAI conducted a VSI at the Valspar facility at 10:30 AM on July 15, 1991. Bill Smith and Paul Robinson explained the facility's operating procedures and waste management practices during an entrance meeting from 10:30 AM to 11:30 AM. The plant tour began at 11:30 AM and included detailed descriptions and observations of plant operations and waste handling units. At 12:45 PM, an exit meeting was held to discuss final closure of the Hazardous Waste Storage Area (SWMU 1) and to pick up copies of a facility map and other documents. At no time during the VSI did RAI observe any problems with mismanaged wastes. RAI concluded the inspection at 1:15 PM.

Photograph No. 1 Location: SWMU 4
Orientation: East Date: 07/15/91
Description: Raw pigment product were stored in Pigment Storage Room.

Photograph No. 2 Location: SWMU 4
Orientation: East Date: 07/15/91
Description: Seven drums of solvent product were stored in the Pigment Storage Room.

Photograph No. 3 Location: SWMU 4
Orientation: West Date: 07/15/91
Description: A total of 36 drums of special waste (off-specification paint) were stored in the Pigment Storage Room, since April, 1991. At the time of the VSI, Valspar was awaiting the results of waste analysis.

Photograph No. 4 Location: Paint Mixing Tanks
Orientation: West Date: 07/15/91
Description: Paint mixing tanks, being cleaned with sodium hydroxide. The waste was to be pumped directly from the tank to a tanker truck outside.



Photograph No. 5 Location: Near SWMU 3
Orientation: North Date: 07/15/91
Description: This pump was used to remove solvent waste from process tanks to drums.

Photograph No. 6 Location: SWMU 1
Orientation: East Date: 07/15/91
Description: This was the site of the Hazardous Waste Storage Area. The concrete pad has been torn up and no longer exists.

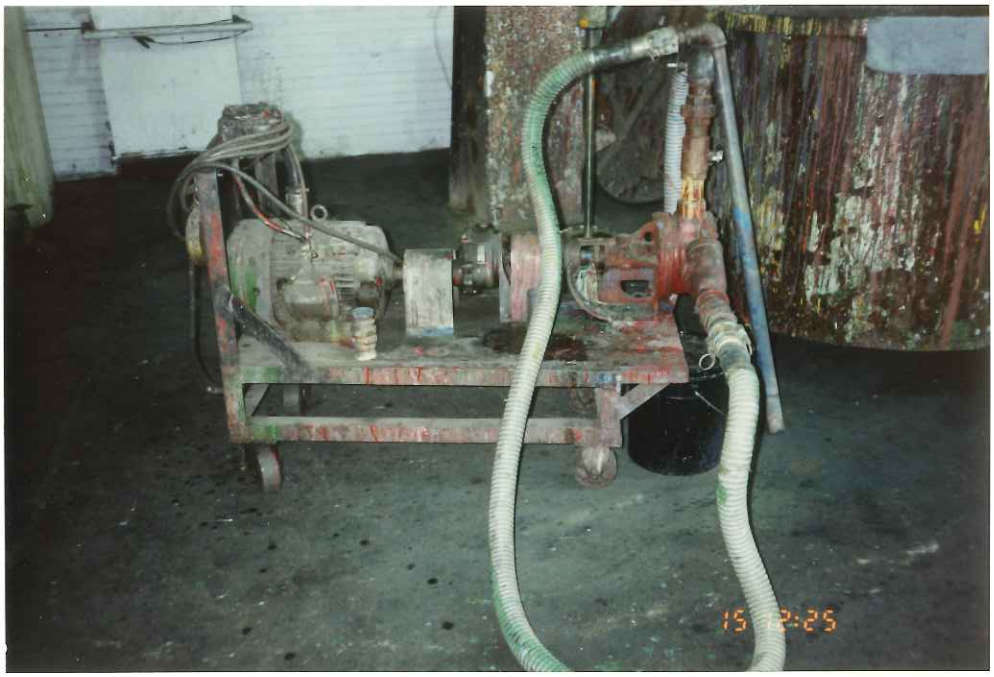
Photograph No. 7 Location: SWMU 2
Orientation: West Date: 07/15/91
Description: The Less Than 90-Day Hazardous Waste Storage Area is a concrete pad that was used after the Hazardous Waste Storage Area was closed.

Photograph No. 8 Location: AOC 2
Orientation: East Date: 07/15/91
Description: The concrete sump in the Caustic Cleaning Area recycles sodium hydroxide. The rinsed sodium hydroxide falls into the sump and is pumped back to the heated vat.

Photograph No. 9 Location: AOC 2
Orientation: West Date: 07/15/91
Description: This heated vat of sodium hydroxide is used to clean customer-returned totes in the Caustic Cleaning Area.

Photograph No. 10 Location: AOC 1
Orientation: Southwest Date: 07/15/91
Description: These 8,000-gallon tanks were used to store solvent product, but are now empty.

Photograph No. 11 Location: Outside AOC 2
Orientation: West Date: 07/15/91
Description: Cleaned, empty, 350-gallon totes being stored outside the Caustic Cleaning Area.



Photograph No. 12 Location: Near Paint Mixing Tanks
Orientation: Southwest Date: 07/15/91
Description: Portable pump used to transfer waste from process to 55-gallon drums..

Photograph No. 13 Location: Dust Collector
Orientation: East Date: 07/15/91
Description: This dust collector (#1) removed pigment particles from manufacturing. Collected pigment was put back into the paint process.

Photograph No. 14 Location: Dust Collector
Orientation: East Date: 07/15/91
Description: This dust collector (#2) removed pigment particles from manufacturing. Collected pigment was put back into the paint process.

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

(22)

7/15/91

VALSPAR E. Moline VST

RAT: Mike German
Rob Singh

Valspar: Paul Robinson (Env. Coordinator)
Bill Stewart (Plant Mgr)

Weather: sunny, 85°F

Notes from meeting
Ceased Production at plant
May 22 1991

Wastes not generated from paint manufacture comes from cleaning processes

① solvent/paint waste (F003, F005) from cleaning out tanks + lines
② bad paint batch, paint scrapings (D001, D005)
③ Sodium hydroxide from cleaning of tanks and totes (D002)

7/15/91 (23)

Satellite area would fill in drum and run it out to the storage area. There were 6 satellite areas within the plant.

1 portable pump was used to pump wastes into drums

everything was made to order industrial paints for farm equipment (John Deere, Caterpillar...) Not retail at this facility (Bulk)

Facility: 4.11 acres / 11 employees
built in 1957 (Tousey Varnish)
1967 sold to Sun Chemical
1968 sold to Minnesota Paint
1970 MP merged w/ Valspar

Spills: (1) May 1985 - a caustic (sodium hydroxide) 50 gallons (pH) spilled from caustic cleaning valve failure

(2) April 1987 - automatic valve failure again 60-75 gallons spilled

(3) 12/5/88 - Solvent tank was dripping, 1L haz. disaster. Released 300 gallons (275 recovered) IEPA spill # 88-1605 (Fecal and) minimized flammability risk

(4) Apr '87 - Trucker unloaded pigment onto the street. Not reported to IEPA but was cleaned up

(5) Jan, '90 - Playground had soil samples taken. No results indicating contamination

(6) No knowledge of an IEPA reported incident ~ 1980 regarding off-site pumping

Bulk tanker comes and directly removes used caustic solution from the tanks

Add pigment (dust) have a vented hood which sucks up to a vibrating bag and the dust is recycled (air permit)

Non-contact cooling water is discharged to city sewers NPDES permit terminated in 1985 (not needed)

Will lot air permit expire because it is no longer needed

Mississippi River about 2 miles NW of plant. Quad City gets water from the river. They are not aware of any private wells

Waste oils mixed w/ waste solvents sent out as DOT (from forklifts and parts washers)

Flow and final sampling report of MW (MW have been pulled) from closure

* Storing resin, pigment, floor scraping, (special wastes) in Pigment Room.

Product mix has not changed in years →

WALK THROUGH

Totes 350 gal

Shipping and receiving done from bay

Raw pigment brought in bags and may be kept in drums

Pigment Room

Last of solvents (4 drums)

Special Wastes being stored since end of April. Basically 36 drums

of ~~paint~~ thinned down resin, diff. spec. paint (special waste)

Testing Consultants is emptying the drums before disposal

Mixing Tank Area

Sodium hydroxide being used to clean the tanks (steel, 1150 gal)

Recycled & reused (pumped from tank to tank) allowed to settle in tank for a day or two

Waste is eventually pumped directly to tankers

Treated ~~sent~~ filtering, resin tanks, packaged, pump

As soon as drum was filled with waste in satellite area was removed to Area 2 Waste Storage Area.

Finished product kept by dock

7/14/91

in Warehous

Security; Building is fenced and has door contacts and motion detectors

Dug up concrete pad of Haz Was Storage area
< 90 Storage Bag intact
appeared sound / could see where mw had been pulled and plugged

taken to American Chemical Service.
~~For~~ by M. Franks
Sent for fuel blending

Started < 90 day pad after Haz Waste Storage Area

7/15/91

Forklifts and partswashers ~~cleaned~~ serviced in Maintenance shop

Cleaning oven (caustic) Sump pumps caustic back into tank and 10 or 15 gallons of city water are used to wash water drain away

Heating coils for vat

Solvent tanks: were on gravel earthen pad

Fence 4 10 feet out = 4.11 acres
own 4.38 acres on west side
playground

Dust collectors

EWR out of East Chicago

ATTACHMENT D

GROUND WATER MONITORING RESULTS OF THE HAZARDOUS WASTE STORAGE AREA

THREE HAWTHORN PARKWAY
VERNON HILLS, ILLINOIS 60061
PHONE: 708-918-4000

17 September 1990

Mr. William Stewart
Valspar Corporation
1101 South Third Street
Minneapolis, Minnesota 55415

Work Order No.: 2944-04-05

Subject: Valspar Corporation, East Moline, Illinois
Weekly Water Level Program

Dear Mr. Stewart:

Under your cover letter dated 23 July 1990, Roy F. Weston, Inc. (WESTON) received water level data from the East Moline facility for the 32 weeks between 9 October 1989 and 1 June 1990. In accordance with the weekly water level measurement program defined by the IEPA groundwater level contour maps were developed for each of these weeks. Water level data is summarized in Table 1 and the related groundwater contour maps are included in Attachment A.

All of the groundwater contour maps to date show that groundwater flow direction is consistently to the north-northwest, indicating that the proposed groundwater monitoring network is sufficient for its intended purpose.

WESTON also received four sets of analytical reports by Beling Consultants, who had analyzed samples from the four monitoring wells on a quarterly basis. These reports were dated 26 December 1989, 21 December 1989, 22 March 1990 and 6 July 1990 and are included in Attachment B.

The results are summarized in Table 2 which shows the detection limits for all parameters that were non detectable during all four quarters and in Table 3 which shows the results for those parameters that were detected. Only lead and chlorobenzene were detected. The detection were inconsistent in that no well had more that one detection during the four quarters. The detected concentrations were not greater that the Practical Quantification Limit (PQL) established for those constituents in the test method being utilized. There is no ground water contamination demonstrated by this data.

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If there are any questions or you require further information, please feel free to contact us at any time.

Very truly yours,

ROY F. WESTON, INC.

James L. Burton /kas
James L. Burton
Professional Enginneer

James A. Kinsey
James A. Kinsey
Project Director

JLB:JAK:amp

Attachment

\WO\W2500\0844.LTR

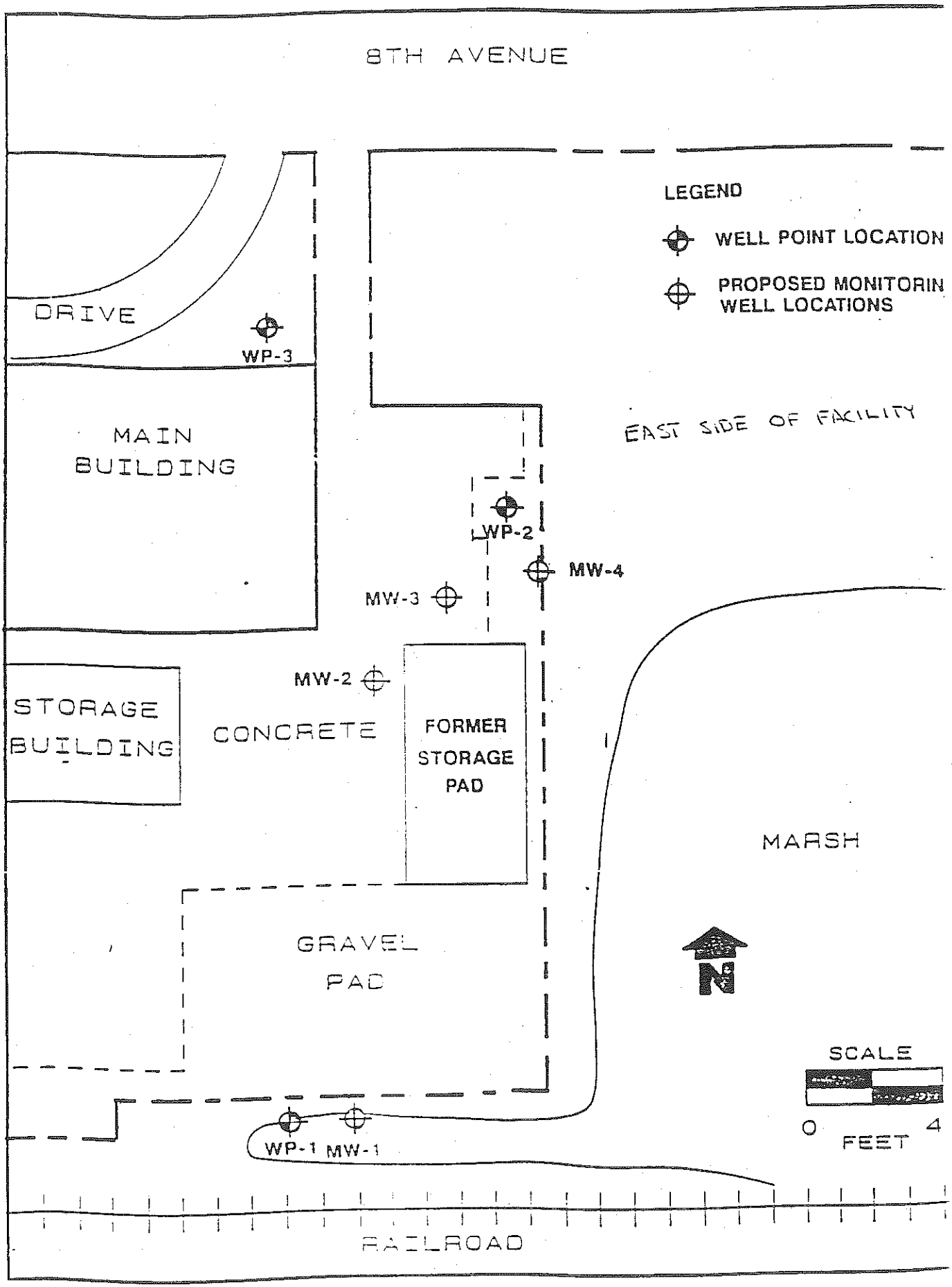

FIGURE 4-1

SITE MAP SHOWING LOCATION OF PROPOSED MONITORING WELLS

Table 1

Valspar Corporation
East Moline, Illinois
Weekly Water Level Measurements

Date	Sampler	(Elv. ft.)	Water Level Measurements				
			MW-1 (581.77)	MW-2 (579.84)	MW-3 (579.80)	MW-4 (582.39)	WP-3 (581.60)
9 Oct 89	DeLuca		4.00	2.45	2.50	5.05	5.10
13 Oct 89	Brown		4.25	2.60	2.65	5.20	5.25
23 Oct 89	DeLuca/Brown		4.40	2.70	2.70	5.25	5.30
30 Oct 89	DeLuca		4.30	2.70	2.70	5.30	5.25
3 Nov 89	DeLuca		4.30	2.65	2.60	5.30	5.20
10 Nov 89	DeLuca		4.20	2.70	2.70	5.30	5.25
17 Nov 89	Brown/Smith		4.45	2.75	2.75	5.30	5.30
26 Nov 89	Smith		4.55	2.95	2.95	5.55	5.50
1 Dec 89	DeLuca		4.55	2.90	2.90	5.50	5.30
8 Dec 89	DeLuca		4.60	2.90	2.95	5.55	5.35
18 Dec 89	Brown		4.80	3.20	3.20	5.85	5.75
27 Dec 89	Brown/Smith		4.80	3.35	3.20	5.80	5.37
2 Jan 90	Brown		4.90	3.30	3.30	5.85	5.55
5 Jan 90	Brown		4.30	2.75	2.75	5.30	5.20
Jan 90	Brown		4.60	2.95	2.95	5.70	5.60
22 Jan 90	Brown		4.60	2.90	2.90	5.55	5.25
29 Jan 90	DeLuca		4.20	2.65	2.70	5.30	4.80
5 Feb 90	Brown		4.60	2.90	2.90	5.50	5.30
9 Feb 90	Brown		4.70	3.00	3.00	5.65	5.45
19 Feb 90	Brown		4.80	3.10	3.10	5.70	5.50
26 Feb 90	DeLuca		3.80	2.30	2.10	4.70	4.60
6 Mar 90	Brown		4.30	2.80	2.80	5.20	5.10
9 Mar 90	DeLuca		3.40	1.70	1.70	4.30	4.25
19 Mar 90	Brown		3.40	1.70	1.70	4.35	4.40
23 Mar 90	DeLuca		3.50	1.75	1.90	4.45	4.50
30 Mar 90	DeLuca		3.50	1.90	1.90	4.55	4.55
9 April 90	Brown		3.80	2.30	2.30	4.90	4.80
16 April 90	Brown		3.60	2.00	2.00	4.70	4.60
30 April 90	Brown		3.85	2.20	2.20	4.85	4.80
11 May 90	Smith		2.75	1.20	1.15	3.80	3.93
18 May 90	DeLuca		2.95	1.45	1.45	4.10	4.20
1 June 90	Smith		3.05	1.60	1.60	4.25	4.35

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Table 2

Detection Limits for All Parameters
That Were Nondetectable During All Four Quarters

	Concentration, mg/l
Chloromethane	0.01
Bromomethane	0.01
Vinyl Chloride	0.01
Chloroethane	0.01
Methylene Chloride	0.005
Trichlorofluoromethane	0.005
1,1-Dichloroethene	0.005
1,1-Dichloroethane	0.005
1,2-Dichloroethene (total)	0.005
Chloroform	0.005
1,2-Dichloroethane	0.005
1,1,1-Trichloroethane	0.005
Carbon Tetrachloride	0.005
Bromodichloromethane	0.005
1,2-Dichloropropane	0.005
cis-1,3-Dichloropropene	0.005
Trichloroethene	0.005
Dibromochloromethane	0.005
2-Chloroethyl Vinyl Ether	0.01
1,1,2-Trichloroethane	0.005
Benzene	0.005
trans-1,3-Dichloropropene	0.005
Bromoform	0.005
Tetrachloroethene	0.005
1,1,2,2-Tetrachloroethane	0.005
Toluene	0.005
Ethylbenzene	0.005
Napthalene	0.01

Table 3

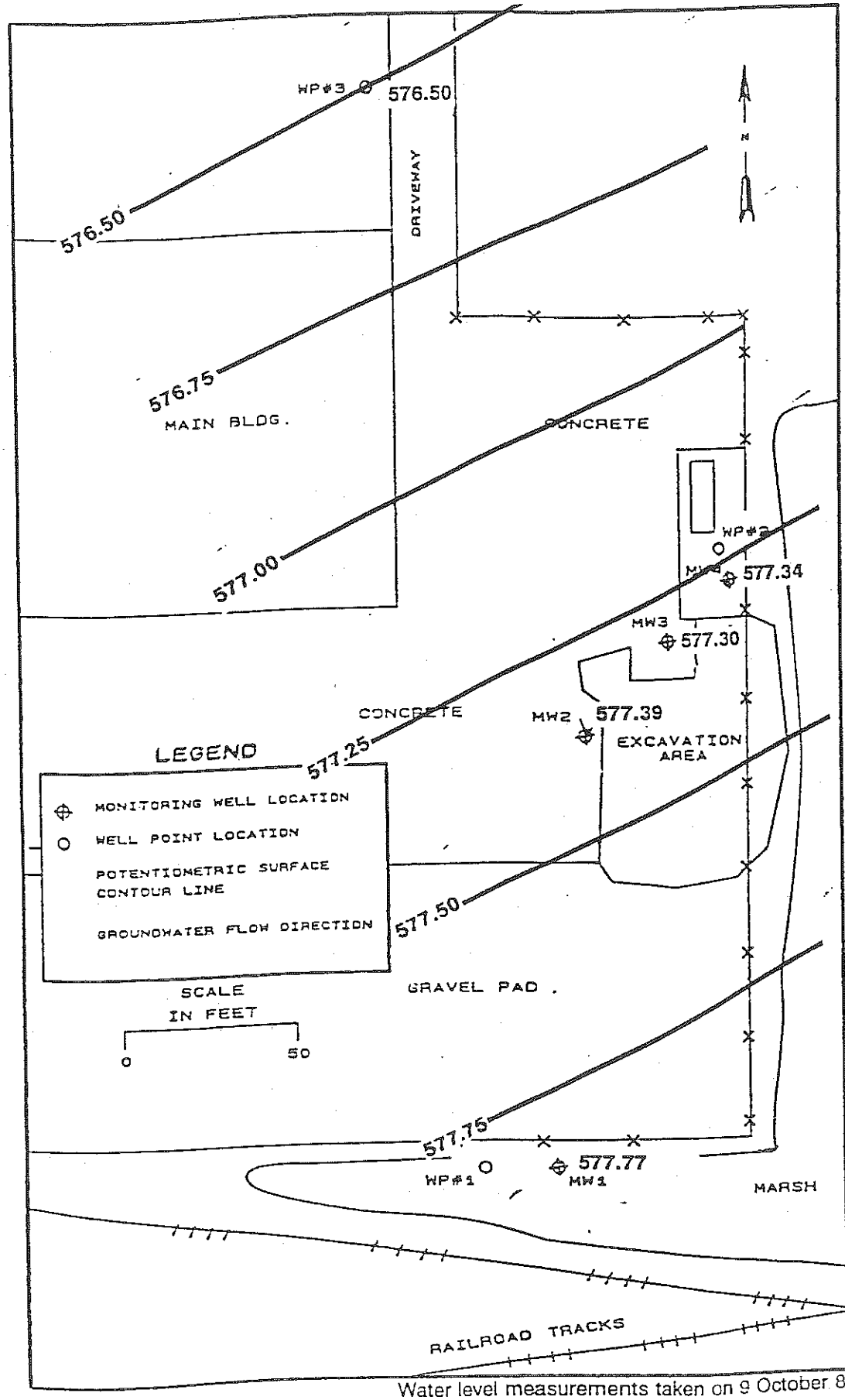
PARAMETERS THAT WERE DETECTED DURING THE FOUR QUARTERS

Constituent	Concentration, mg/l MW-1	MW-2	MW-3	MW-4	Report Date
Lead*	<0.1	<0.1	<0.1	<0.1	26 September 1989
	0.1	0.1	0.1	<0.1	21 December 1989
	<0.1	<0.1	<0.1	<0.1	22 March 1990
	<0.05	<0.05	<0.05	<0.05	6 July 1990
Chlorobenzene**	<0.005	<0.005	<0.005	<0.005	26 September 1989
	<0.005	<0.005	<0.005	<0.005	21 December 1989
	<0.005	<0.005	<0.005	0.005	22 March 1990
	<0.005	<0.005	<0.005	<0.005	6 July 1990

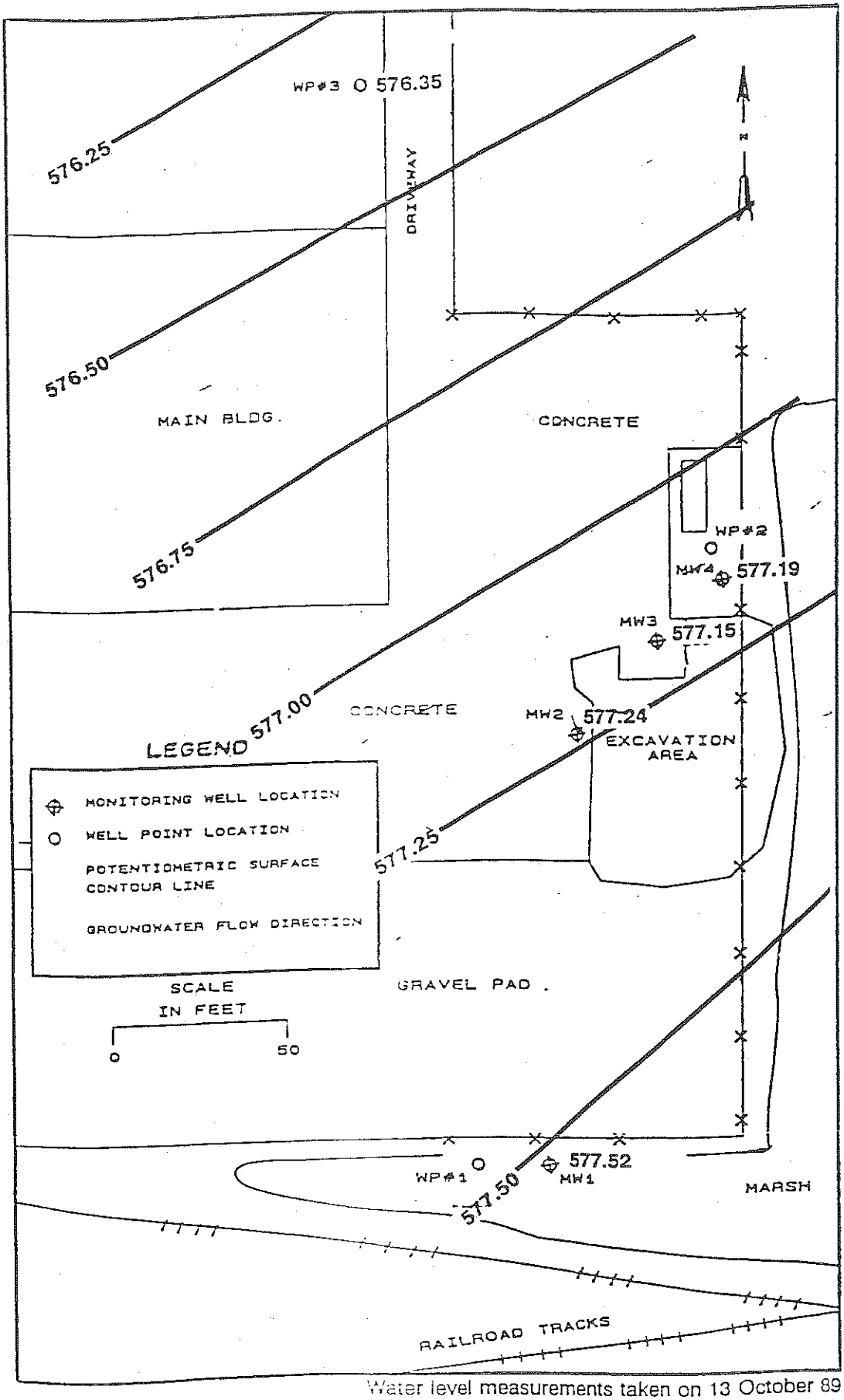
* Practical Qualitative Limit (PQL) = 0.1 mg/l

** PQL = 0.005 mg/l

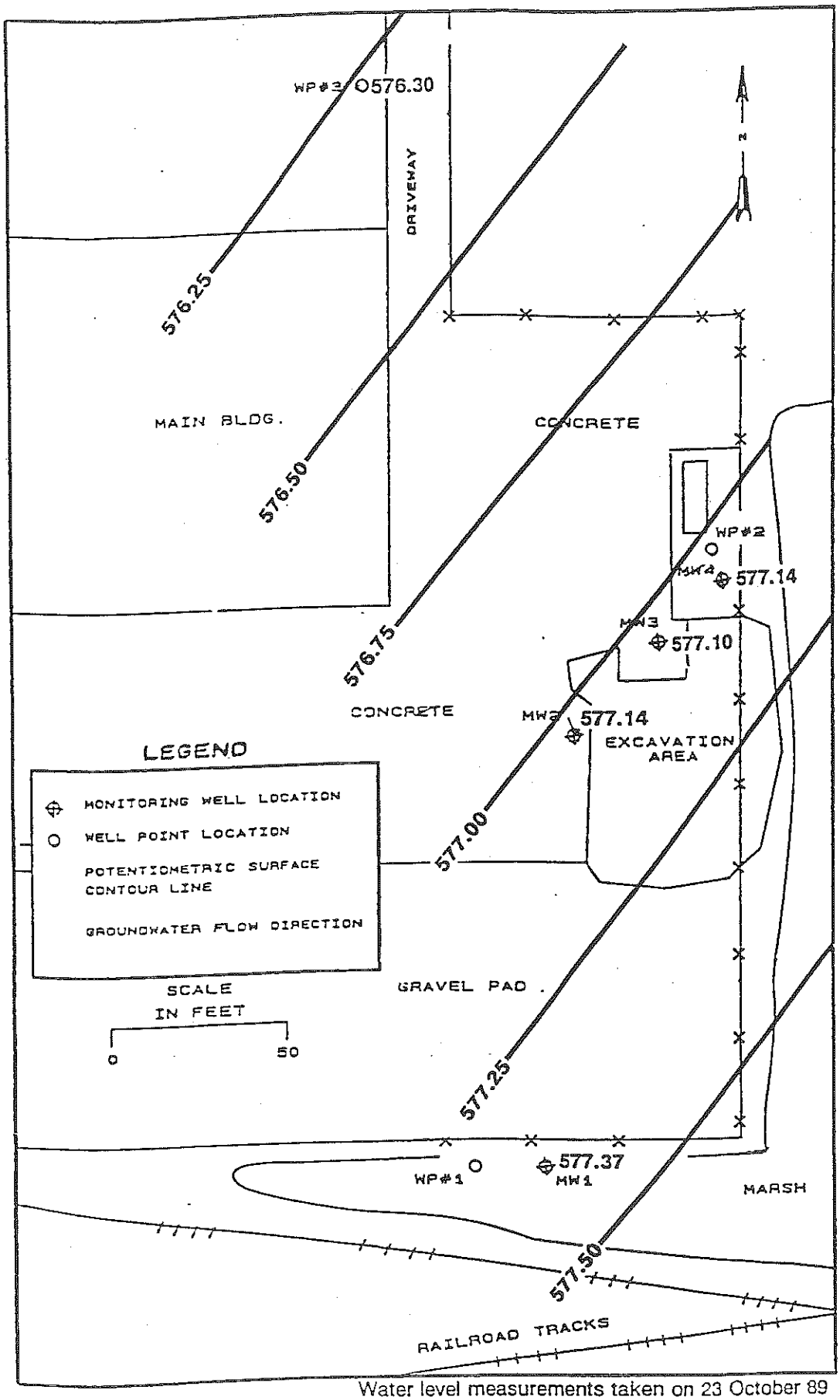
ATTACHMENT A



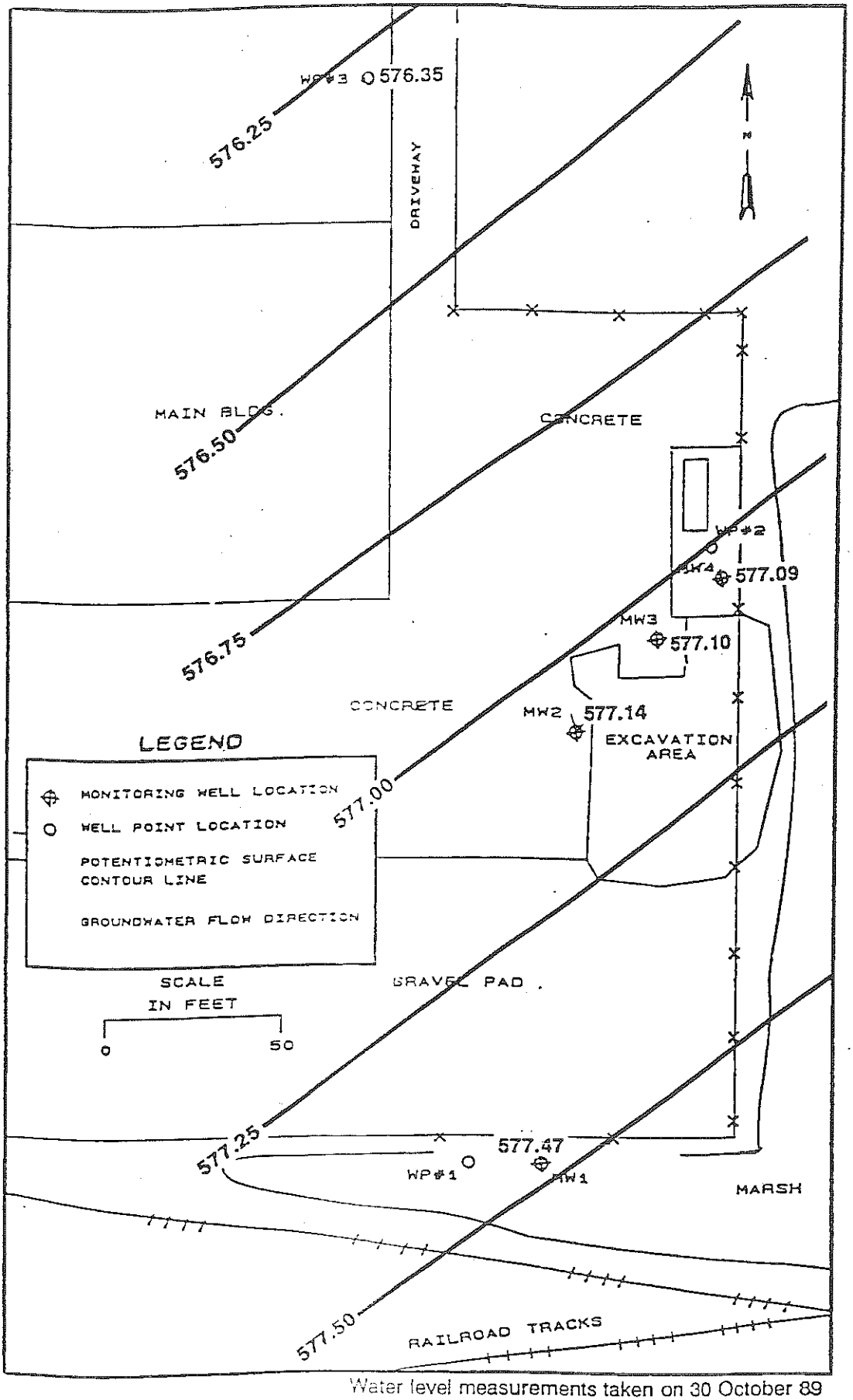
Water level measurements taken on 9 October 89



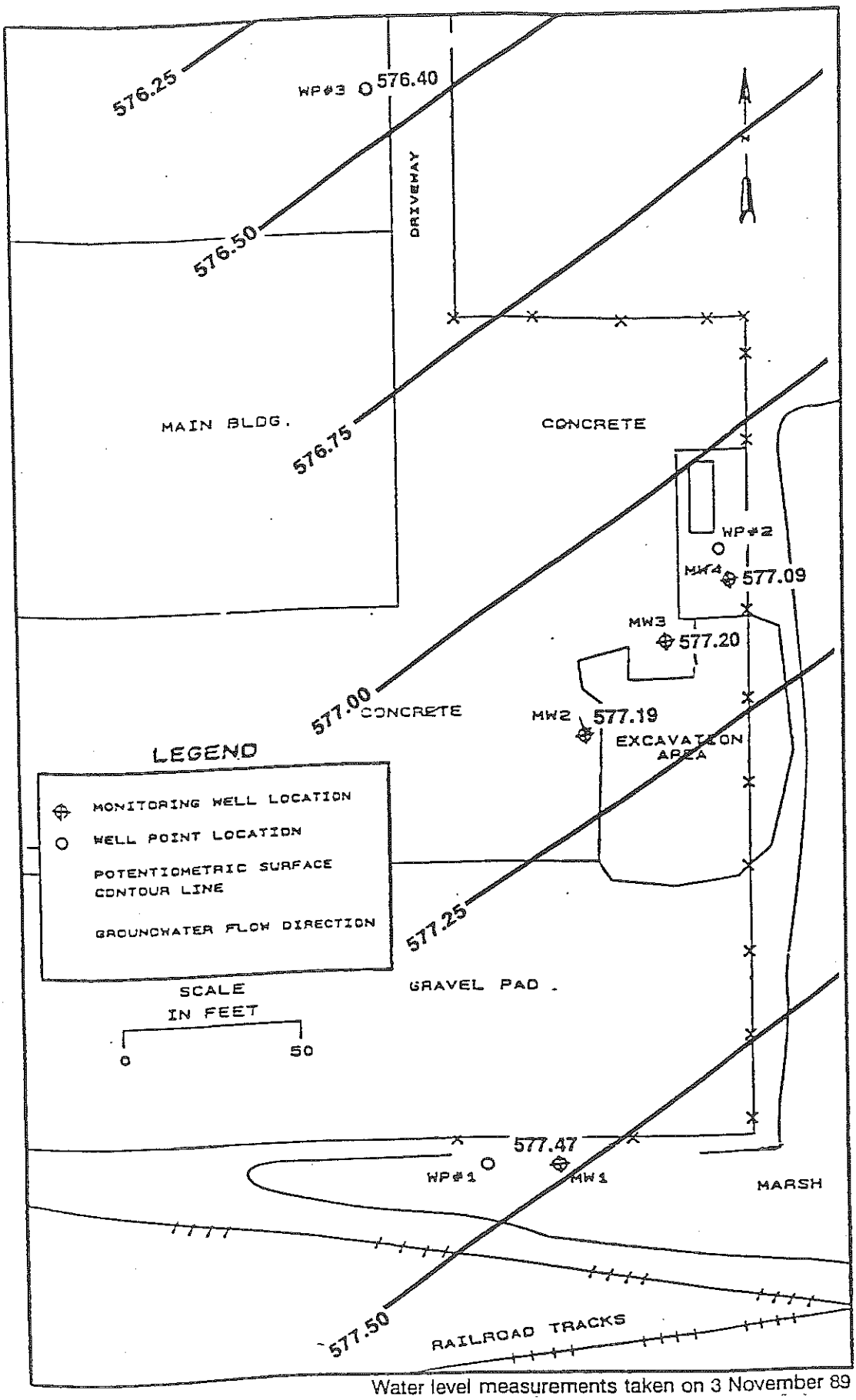
Water level measurements taken on 13 October 89



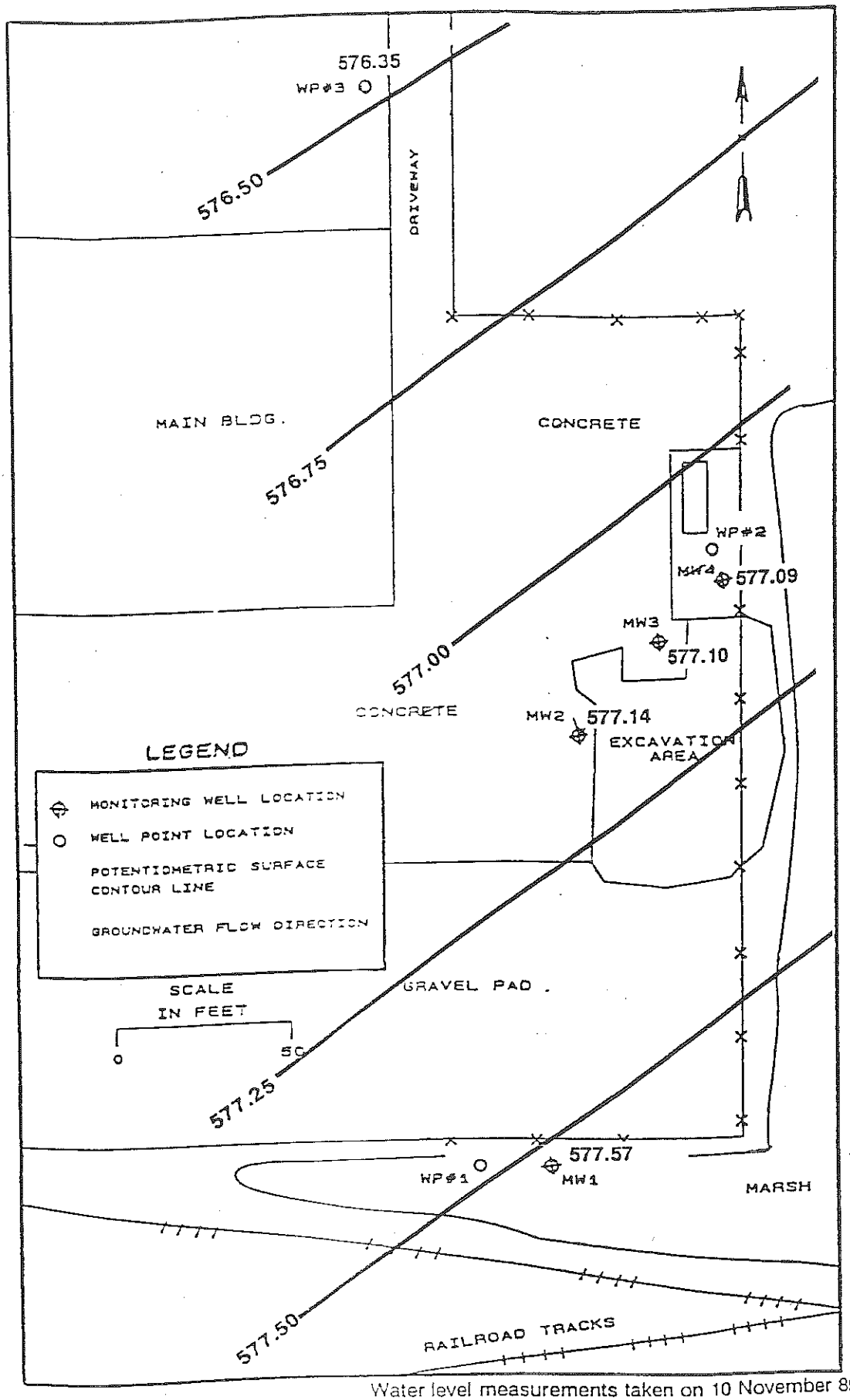
Water level measurements taken on 23 October 89



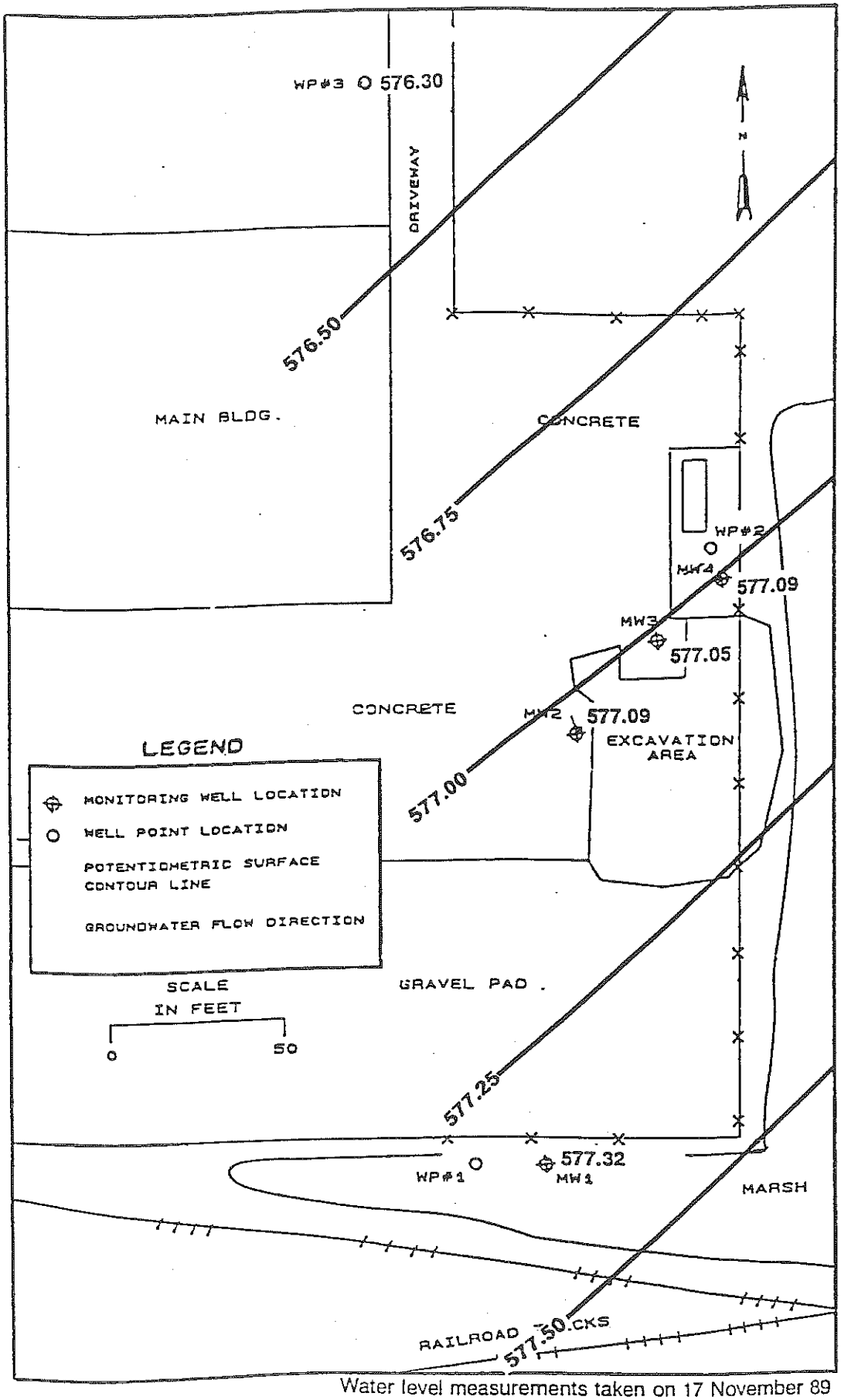
Water level measurements taken on 30 October 89



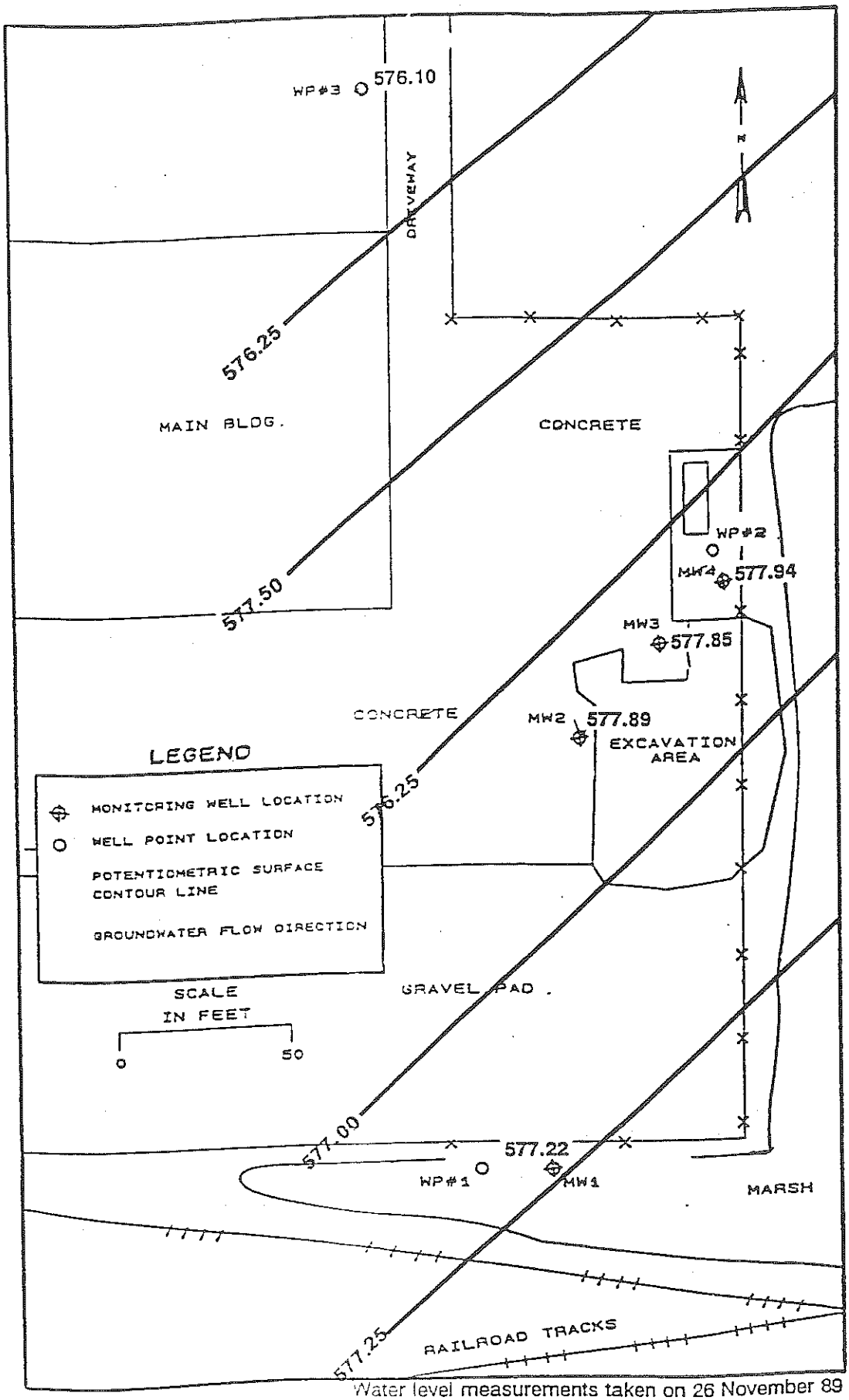
Water level measurements taken on 3 November 89



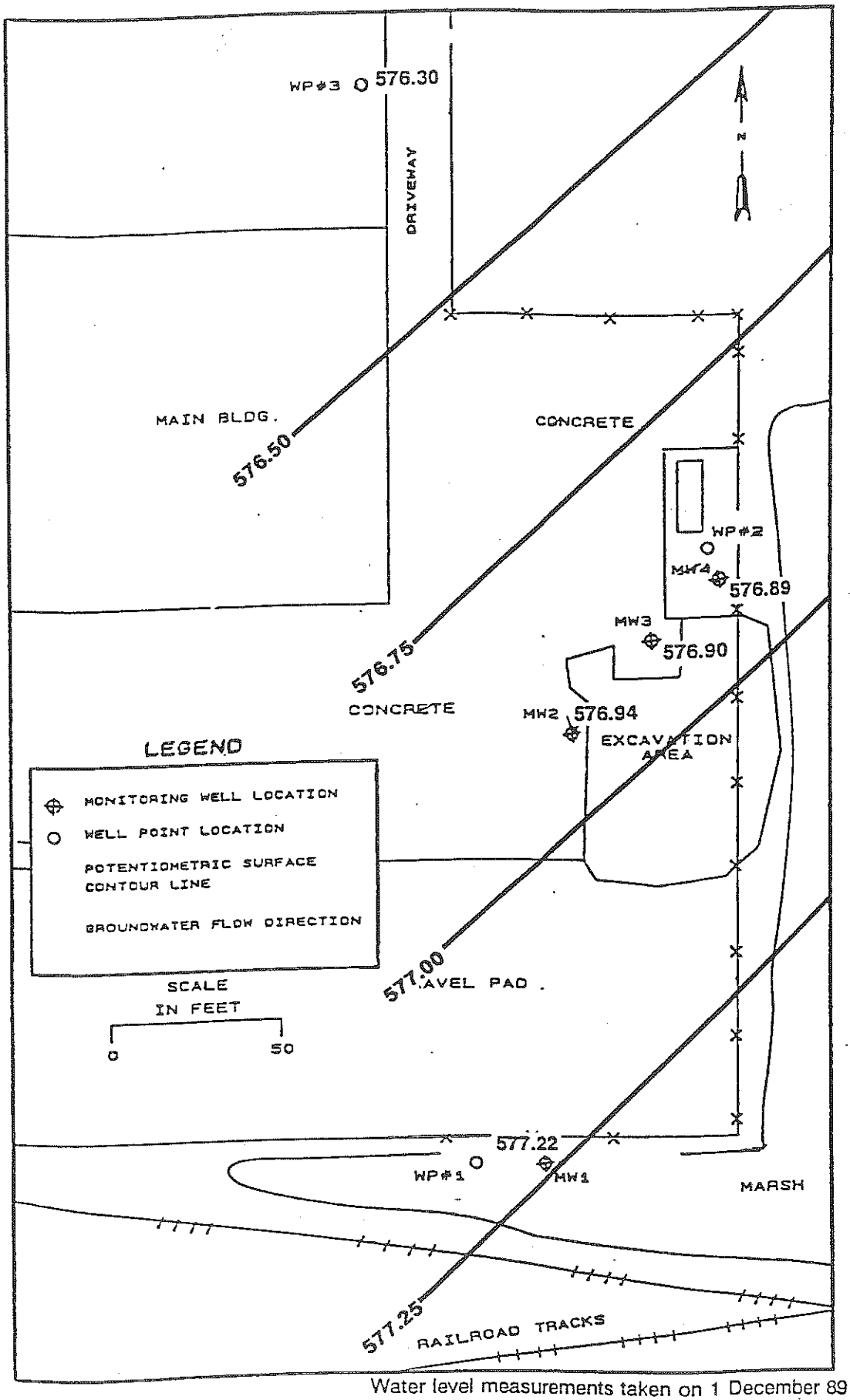
Water level measurements taken on 10 November 89



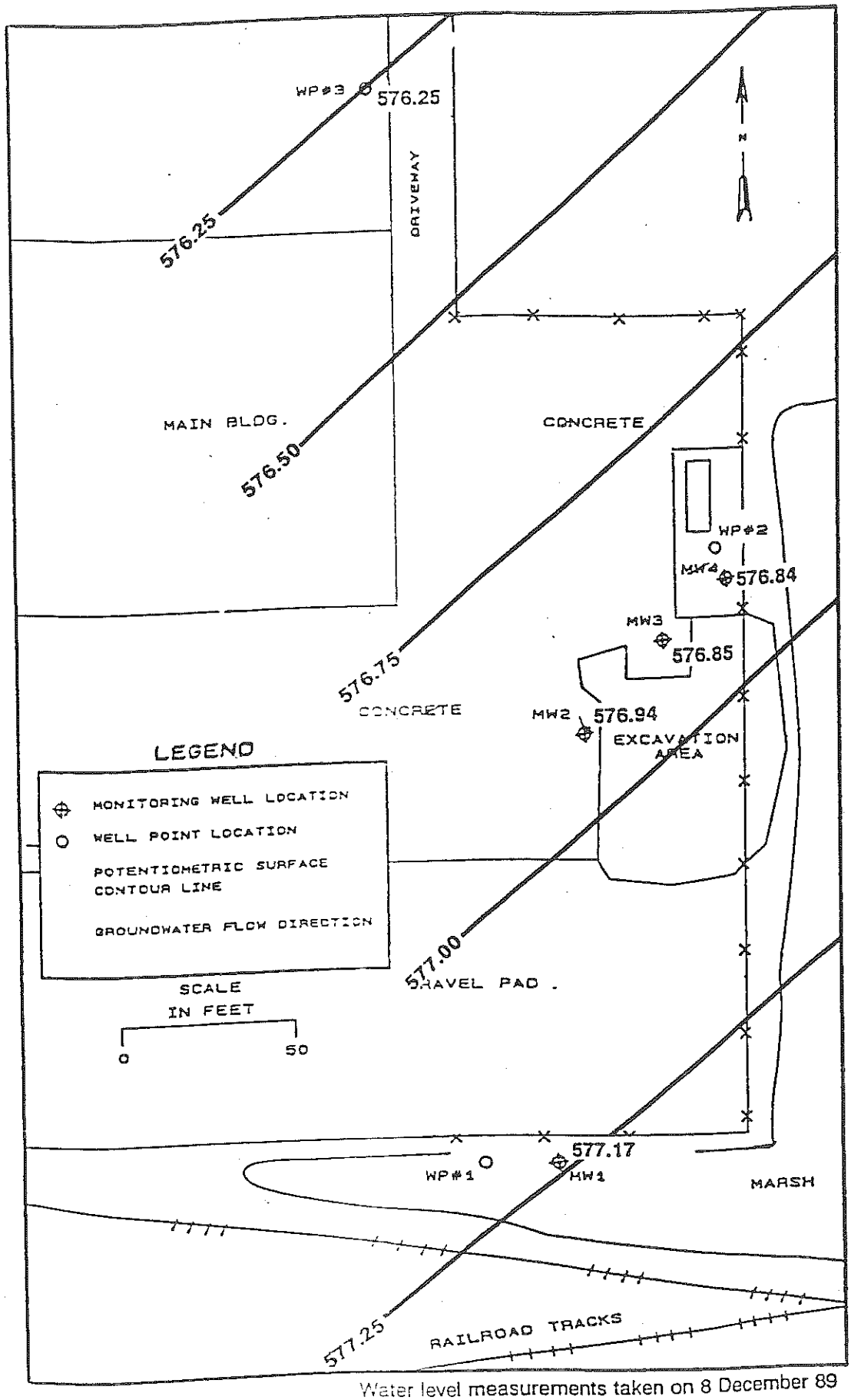
Water level measurements taken on 17 November 89



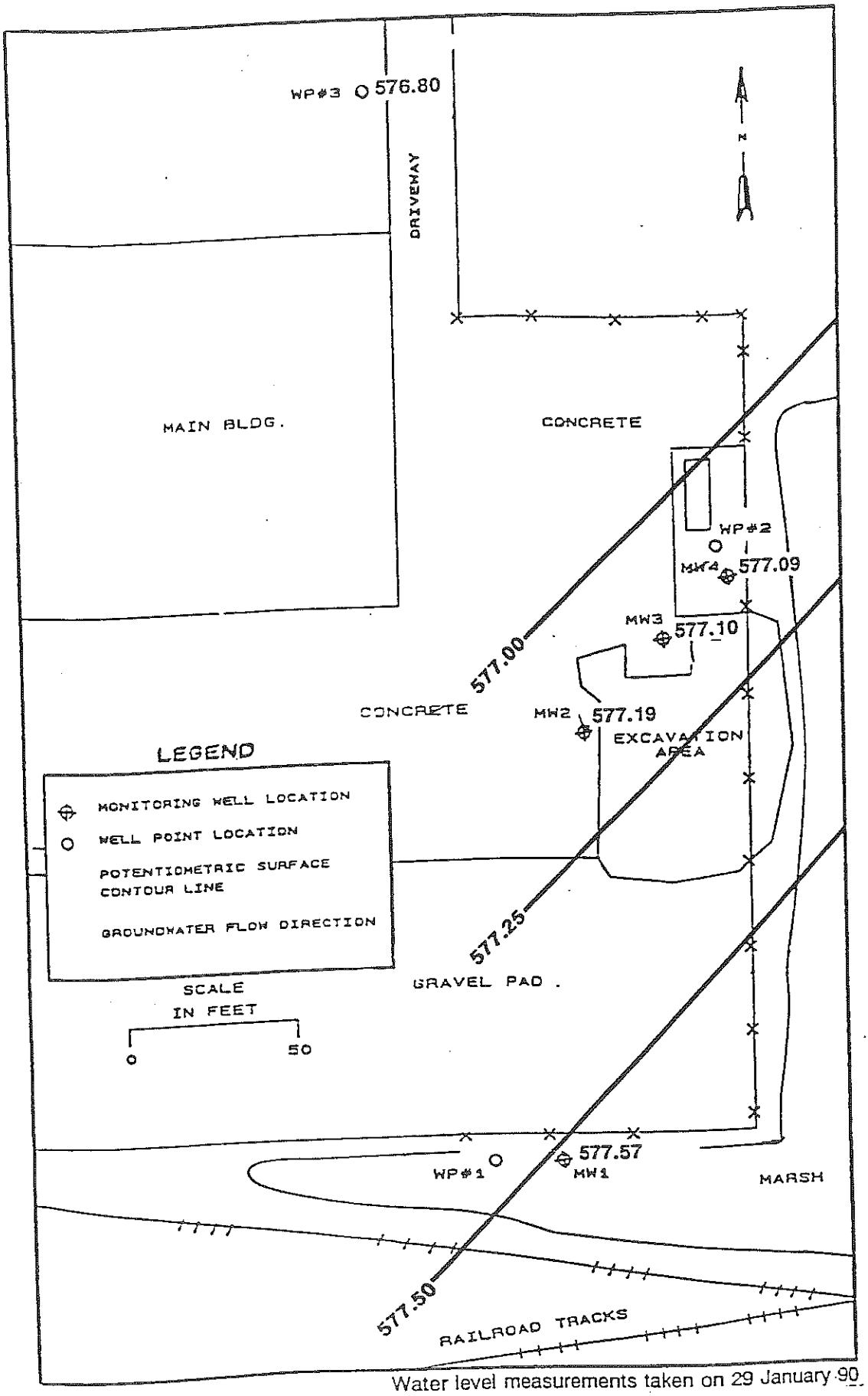
Water level measurements taken on 26 November 89



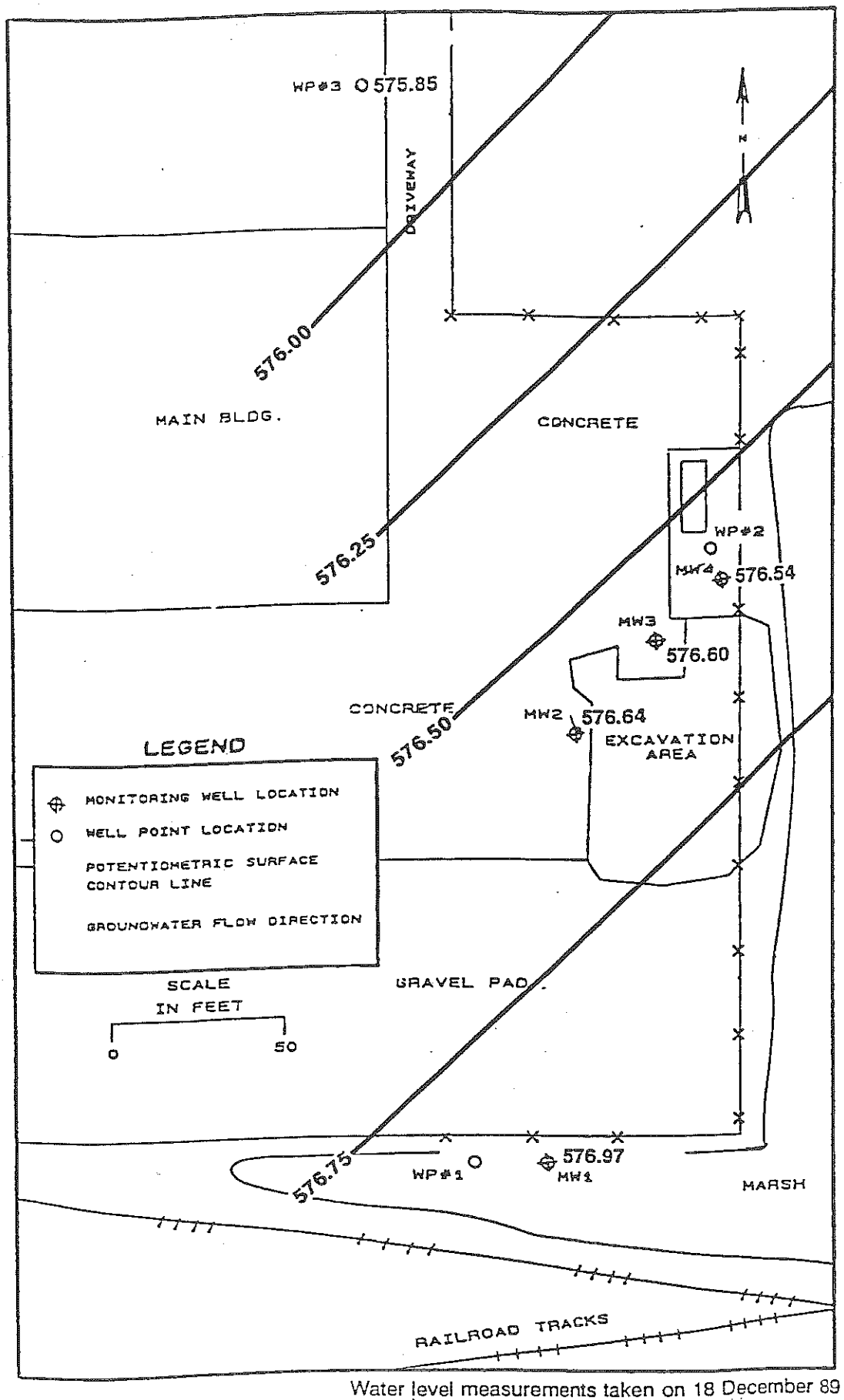
Water level measurements taken on 1 December 89



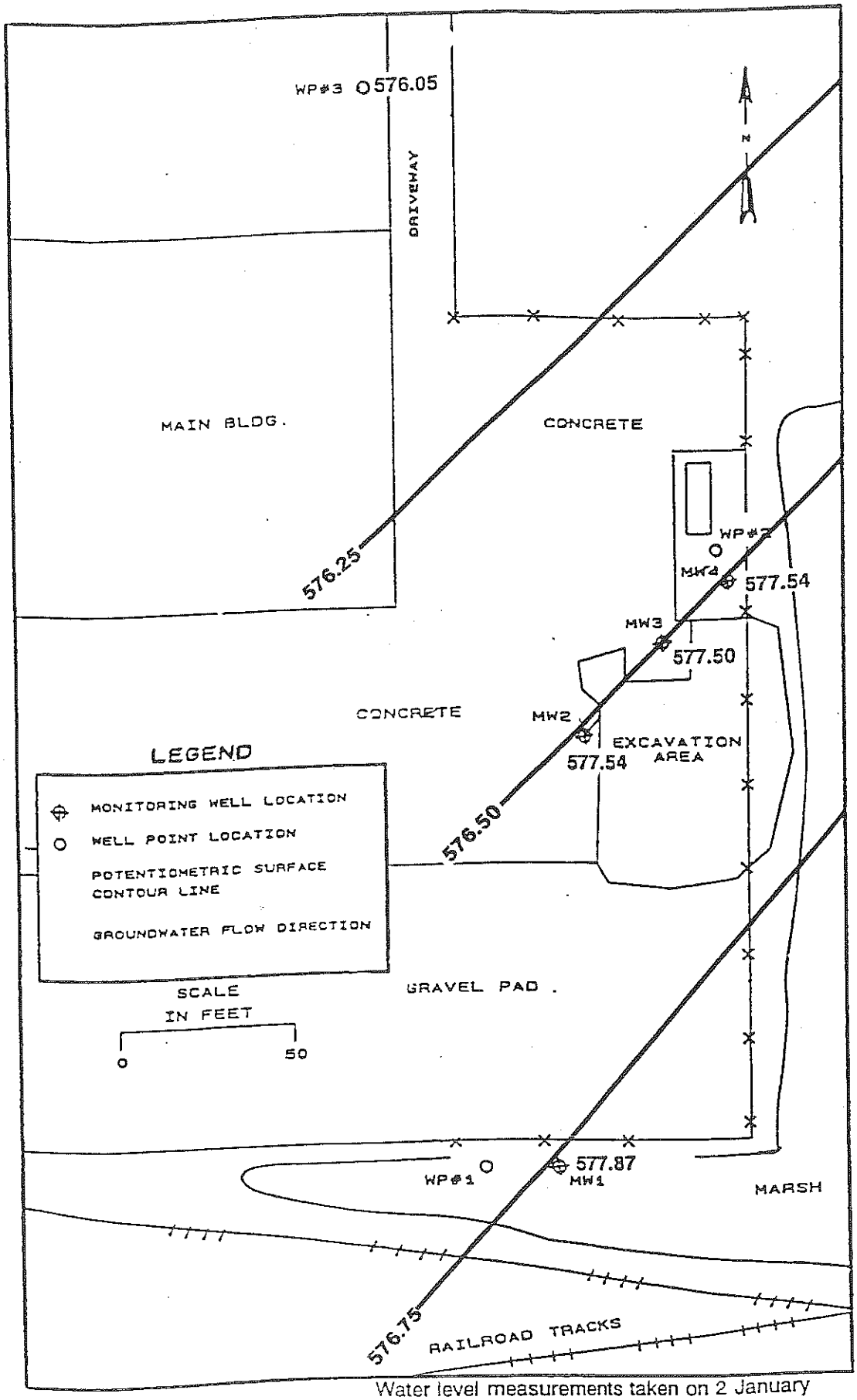
Water level measurements taken on 8 December 89



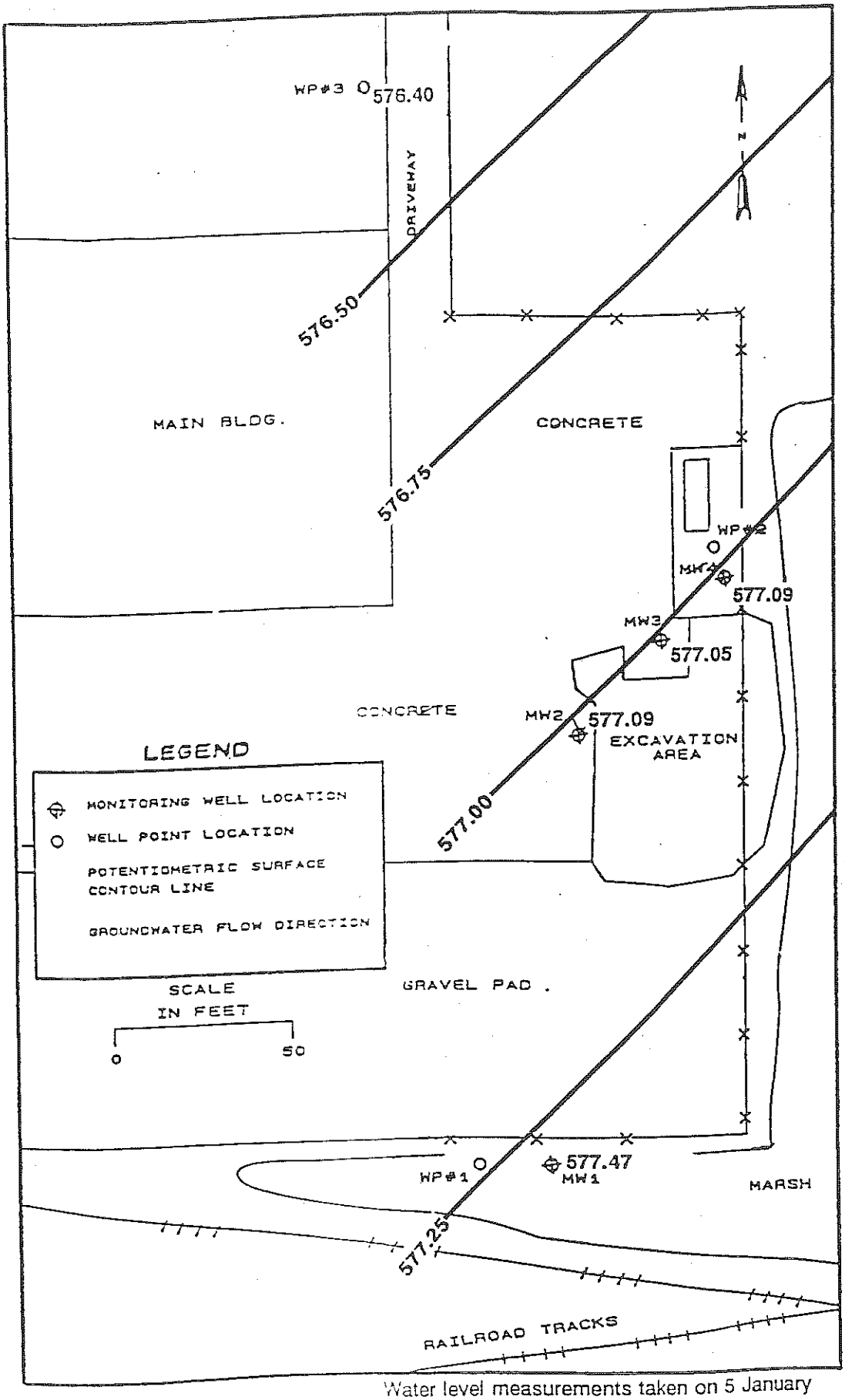
Water level measurements taken on 29 January 90



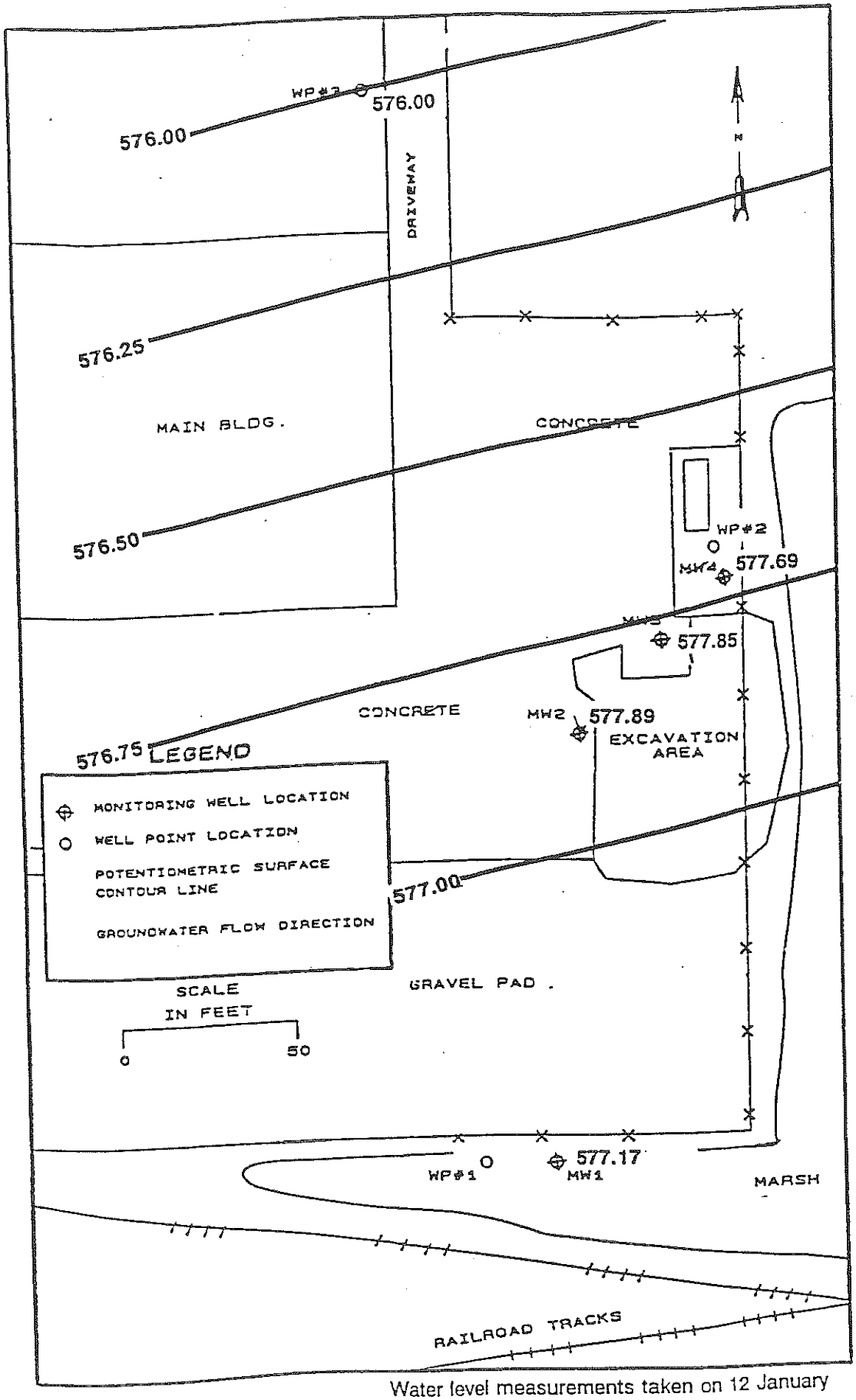
Water level measurements taken on 18 December 89



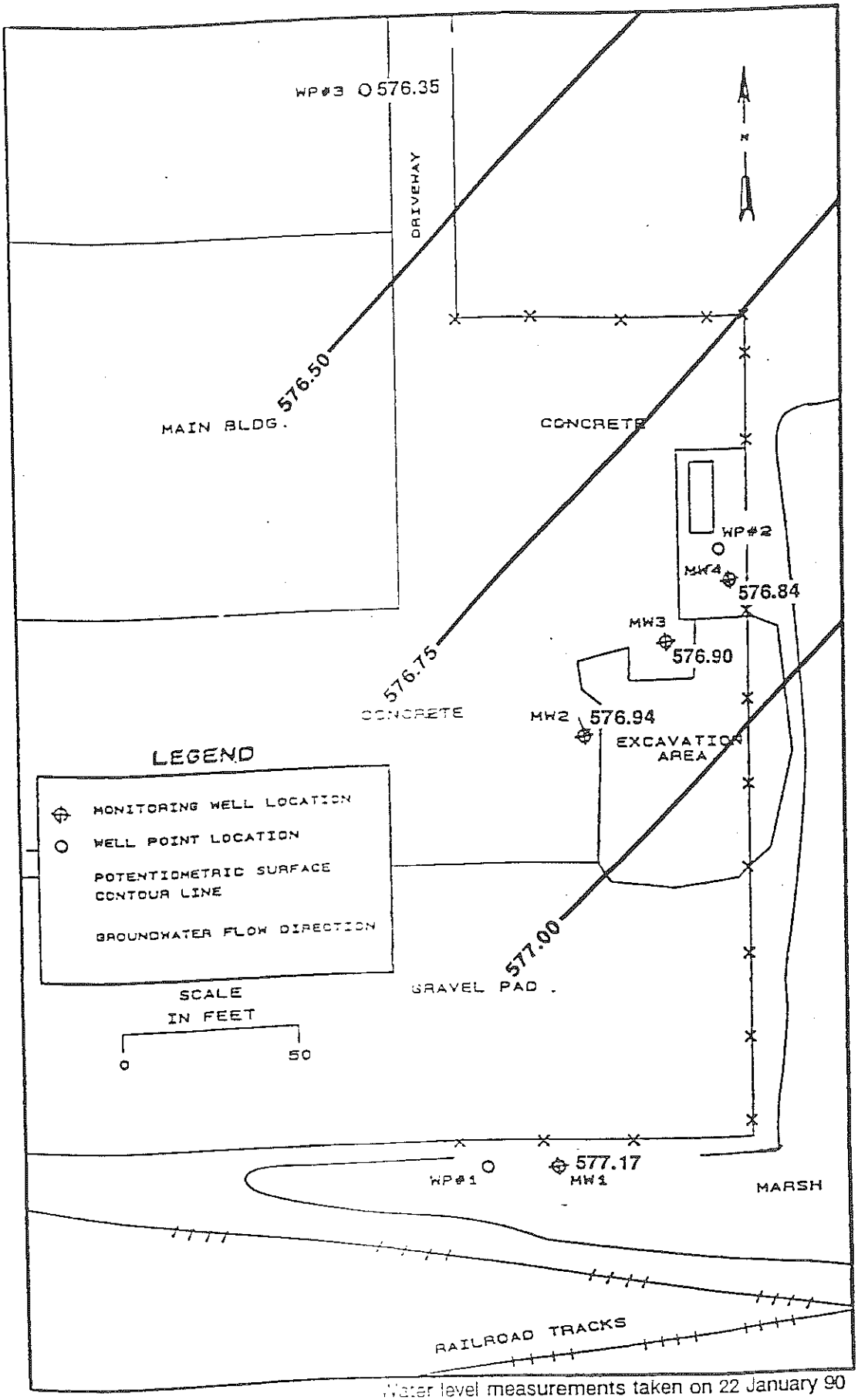
Water level measurements taken on 2 January



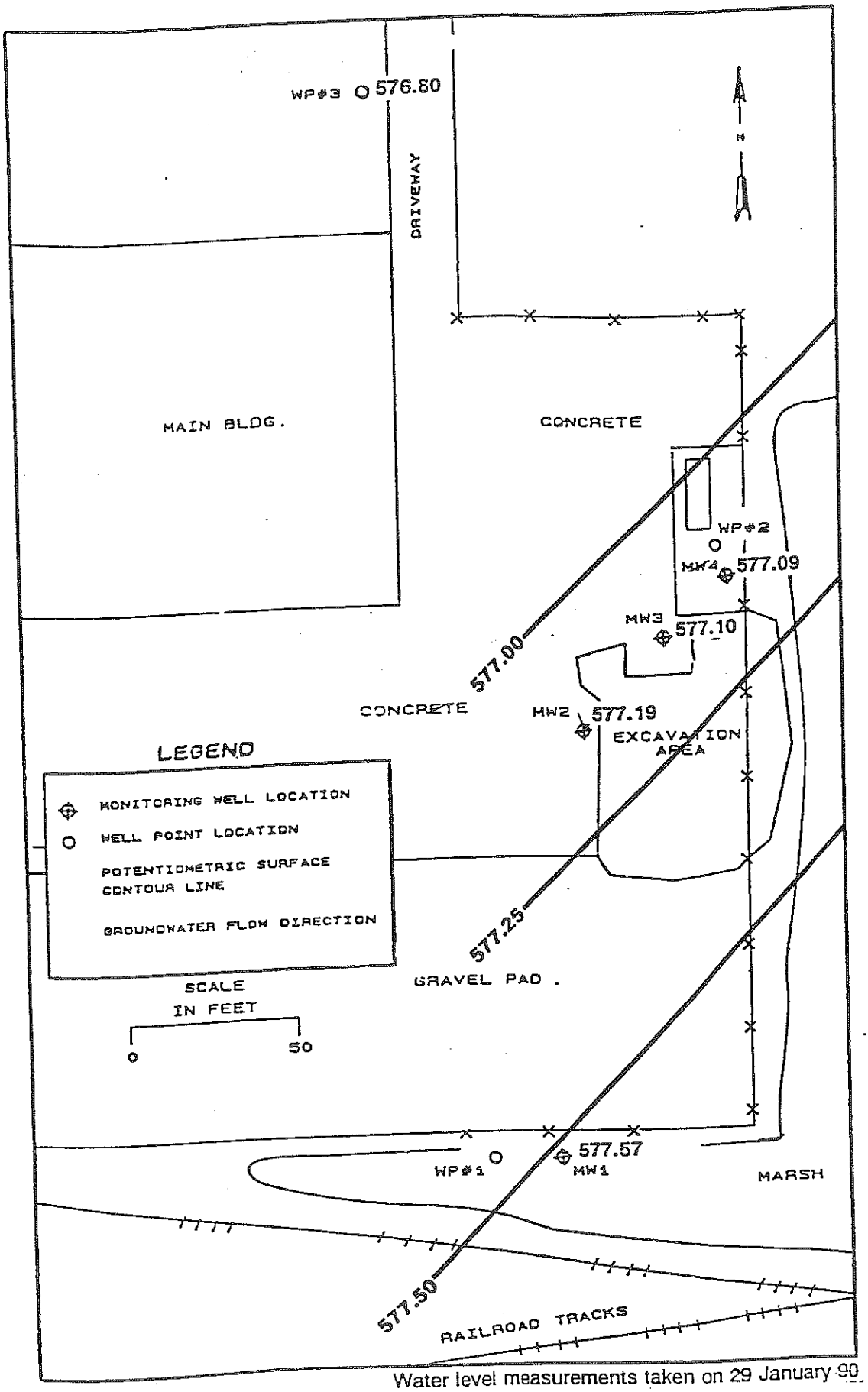
Water level measurements taken on 5 January



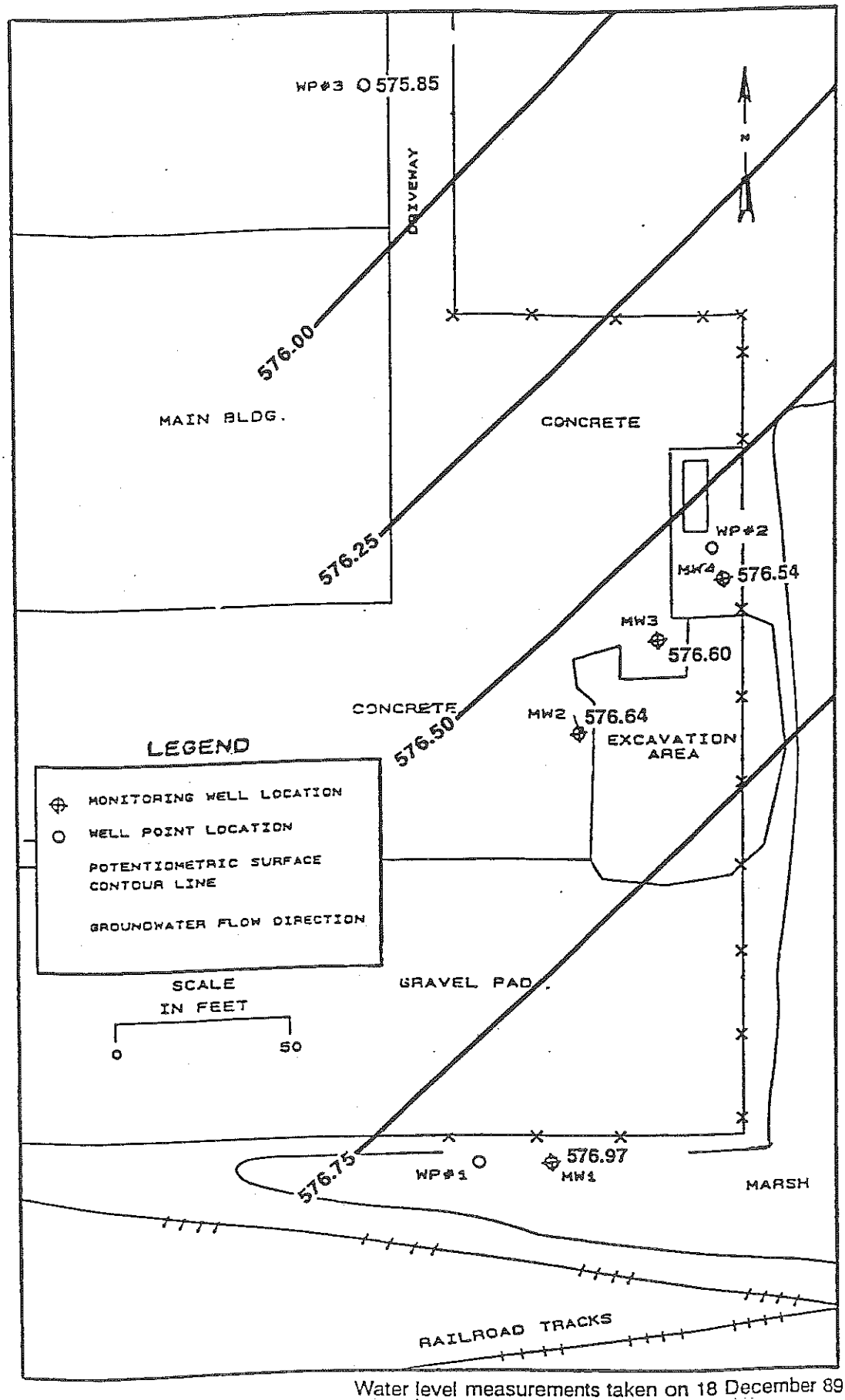
Water level measurements taken on 12 January



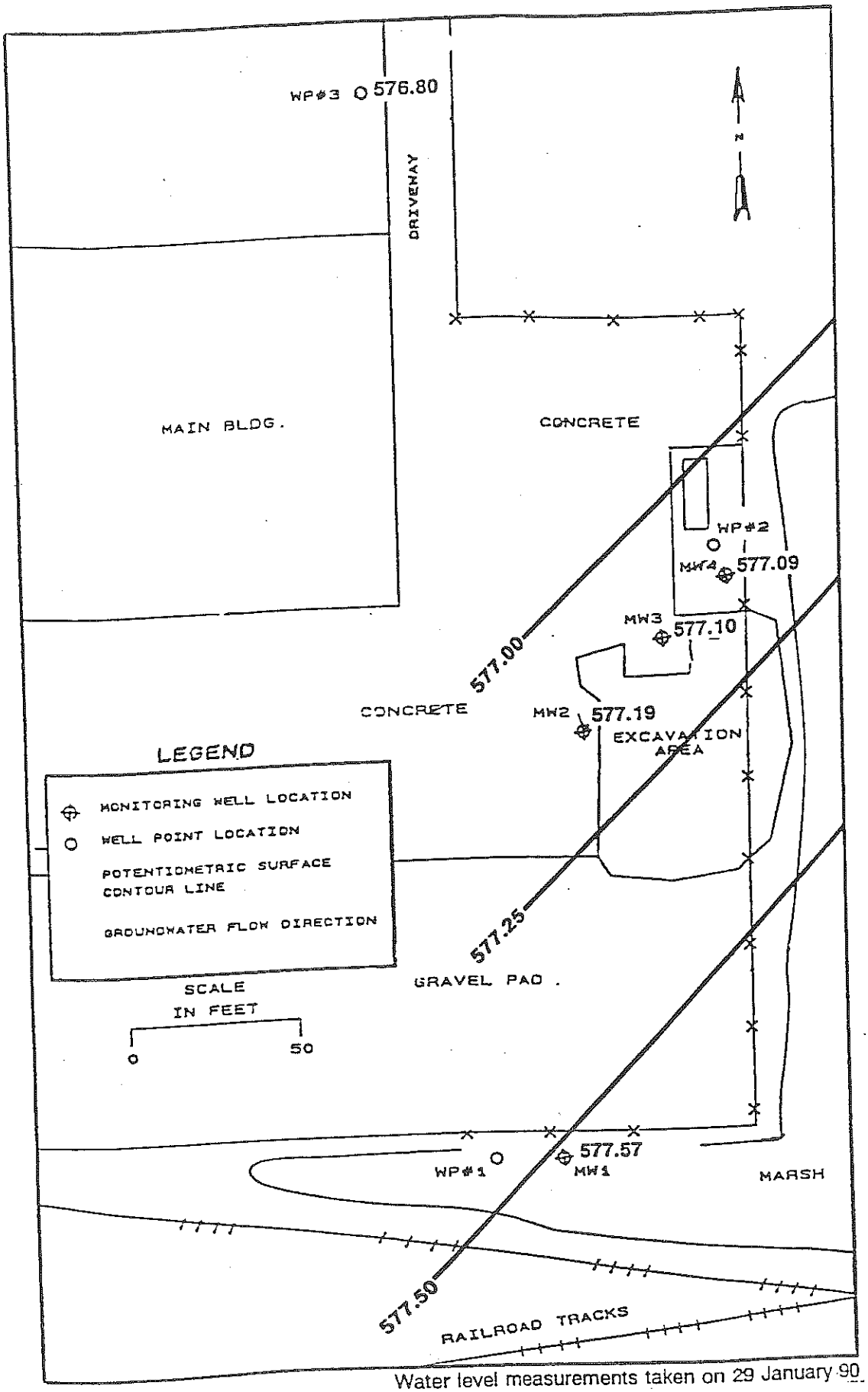
Water level measurements taken on 22 January 90



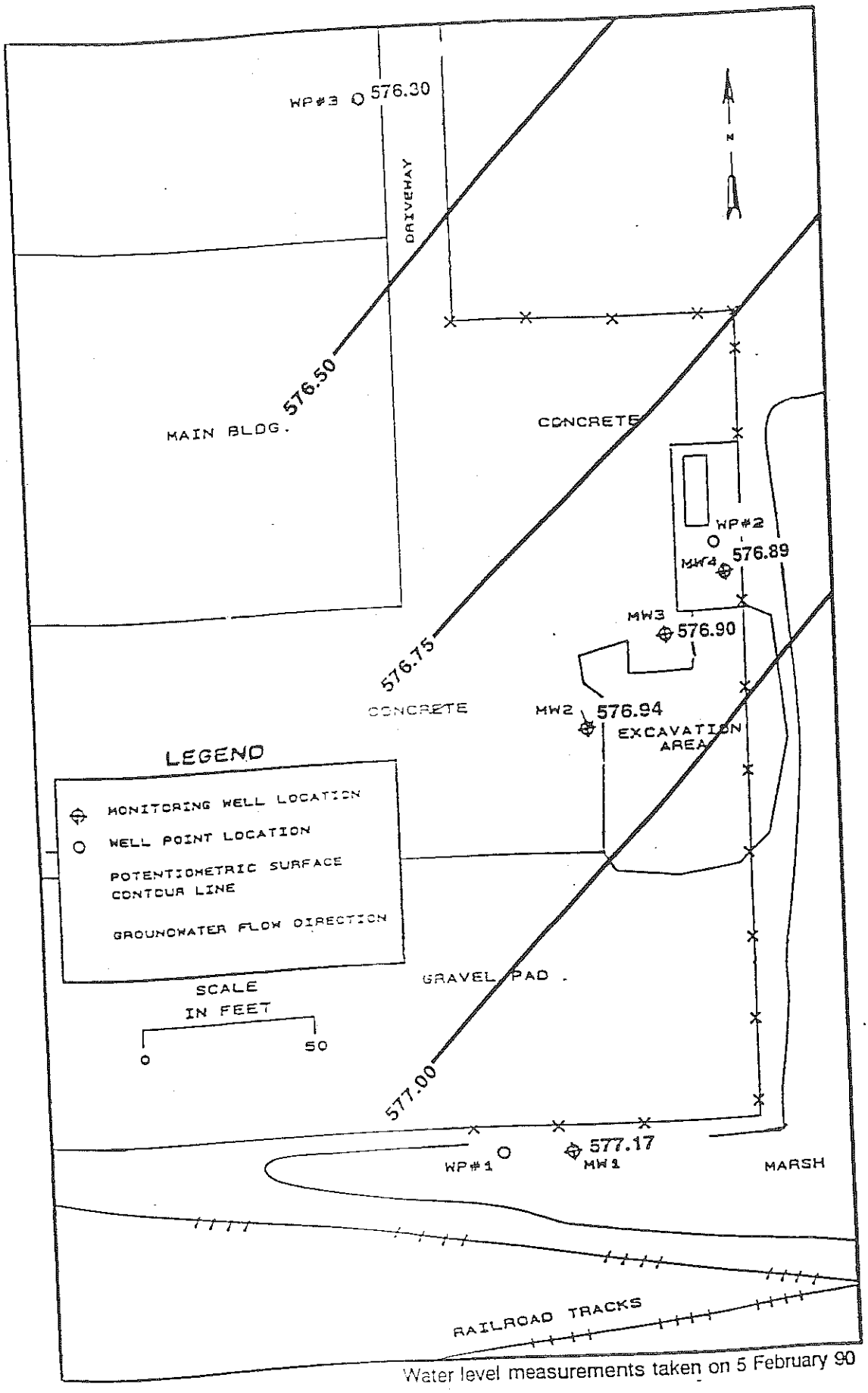
Water level measurements taken on 29 January 90



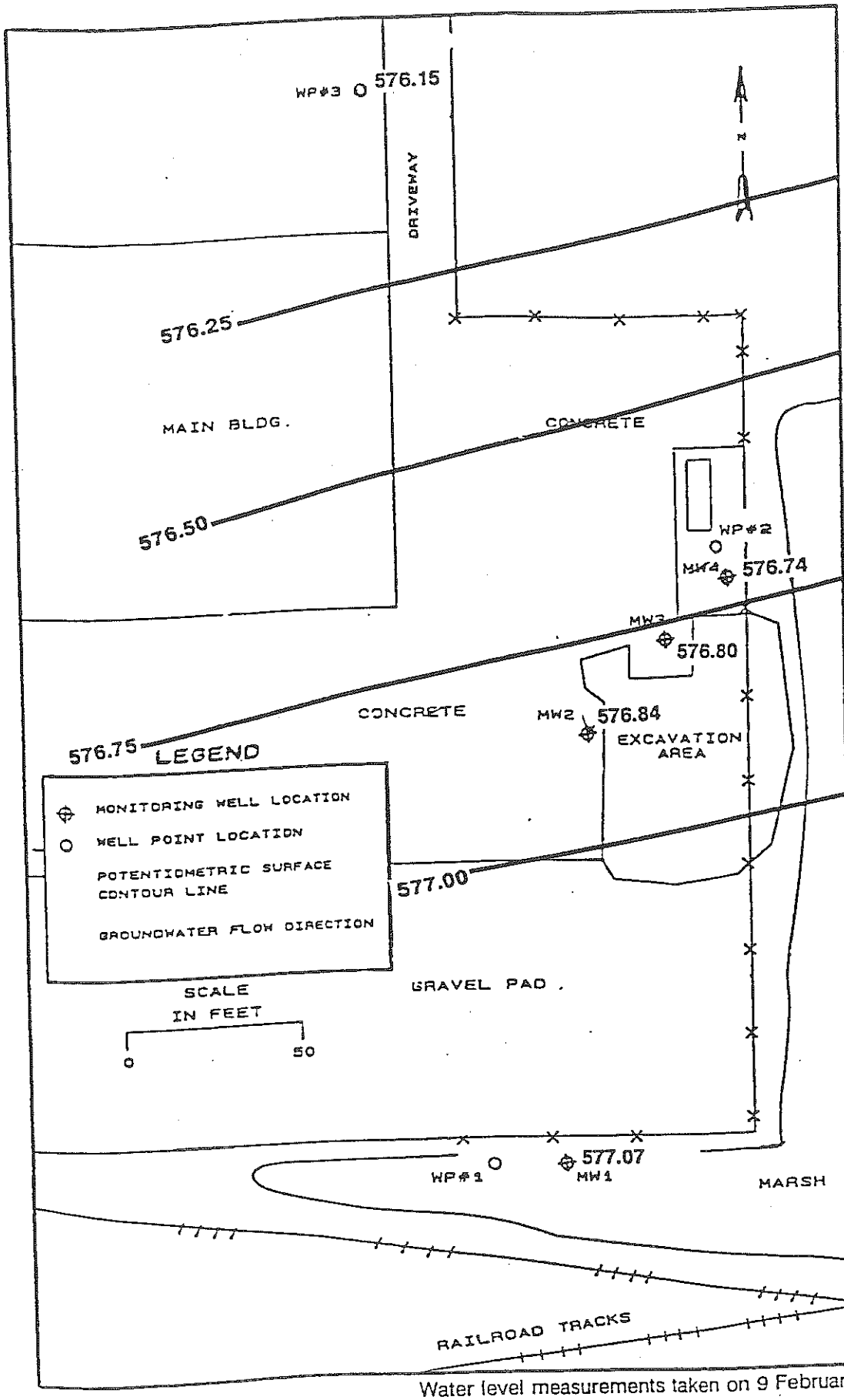
Water level measurements taken on 18 December 89



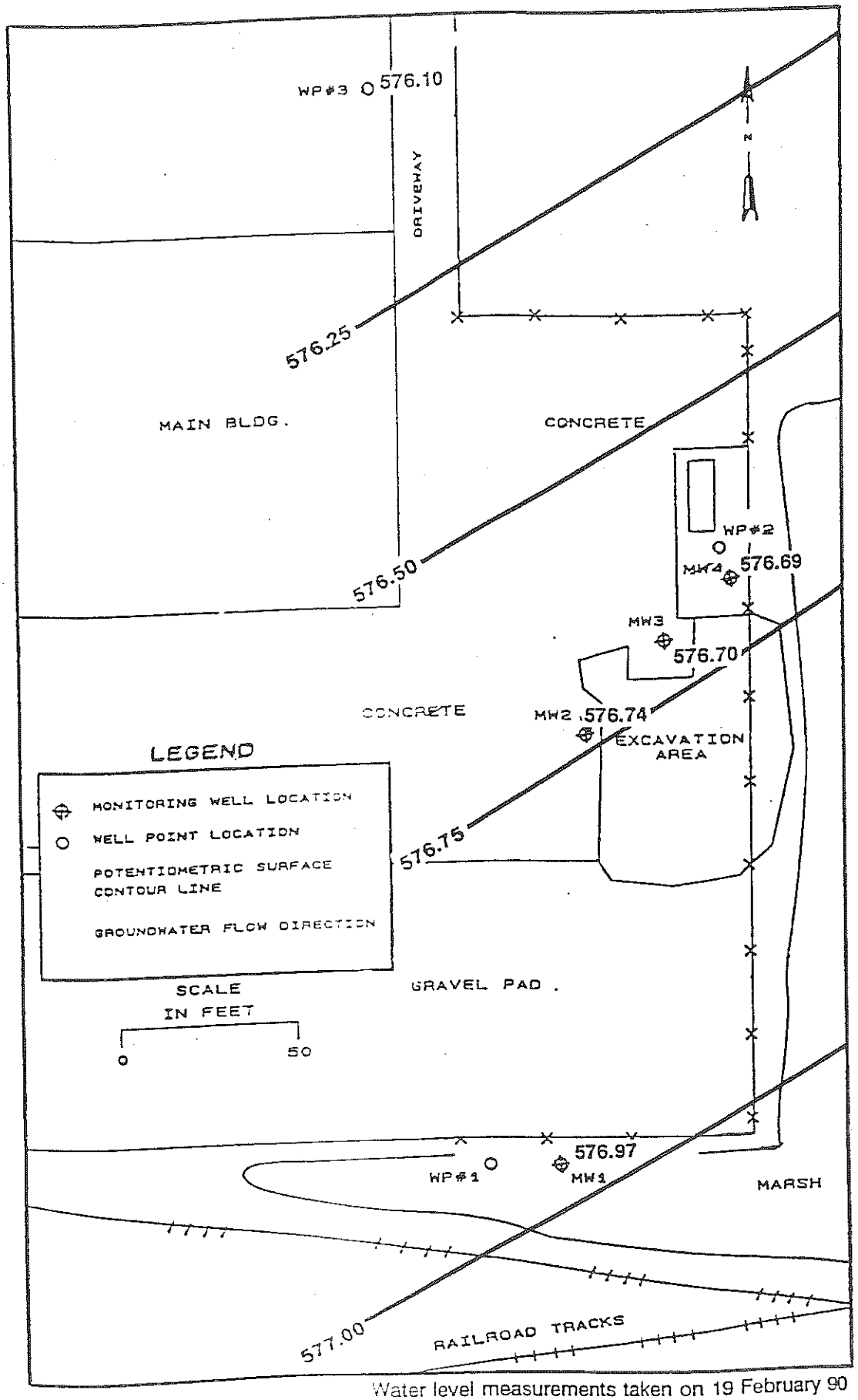
Water level measurements taken on 29 January 90



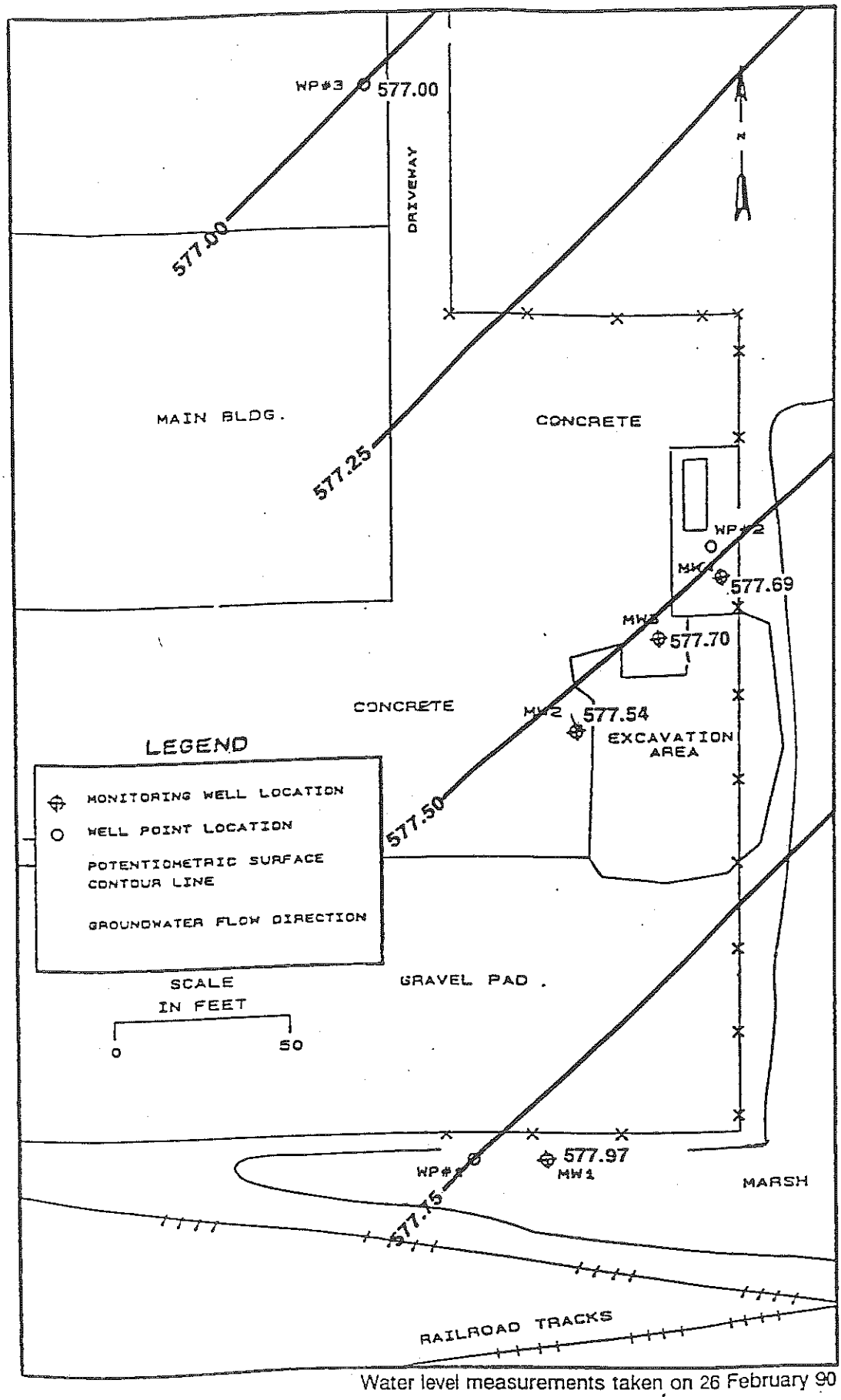
Water level measurements taken on 5 February 90



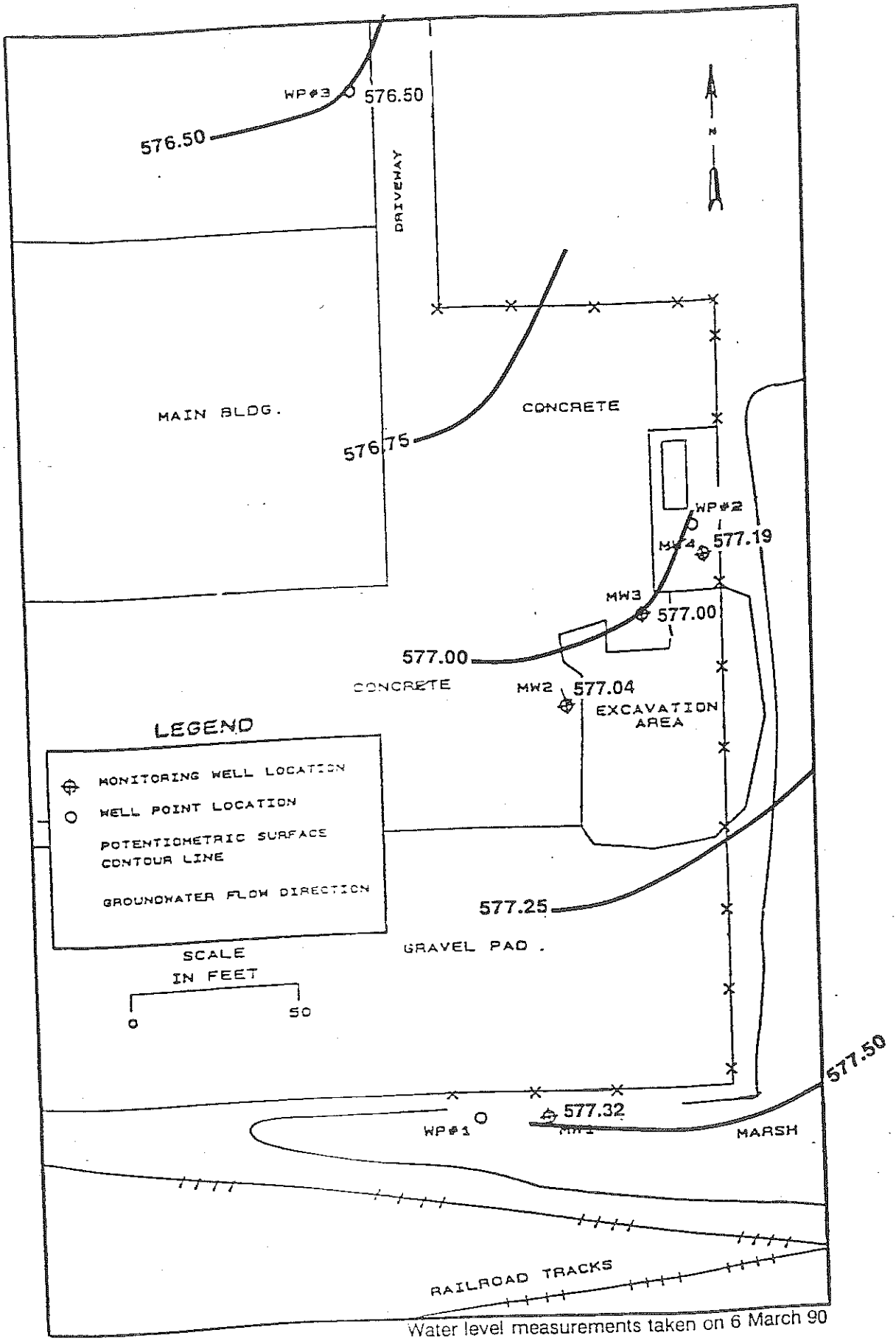
Water level measurements taken on 9 February 90



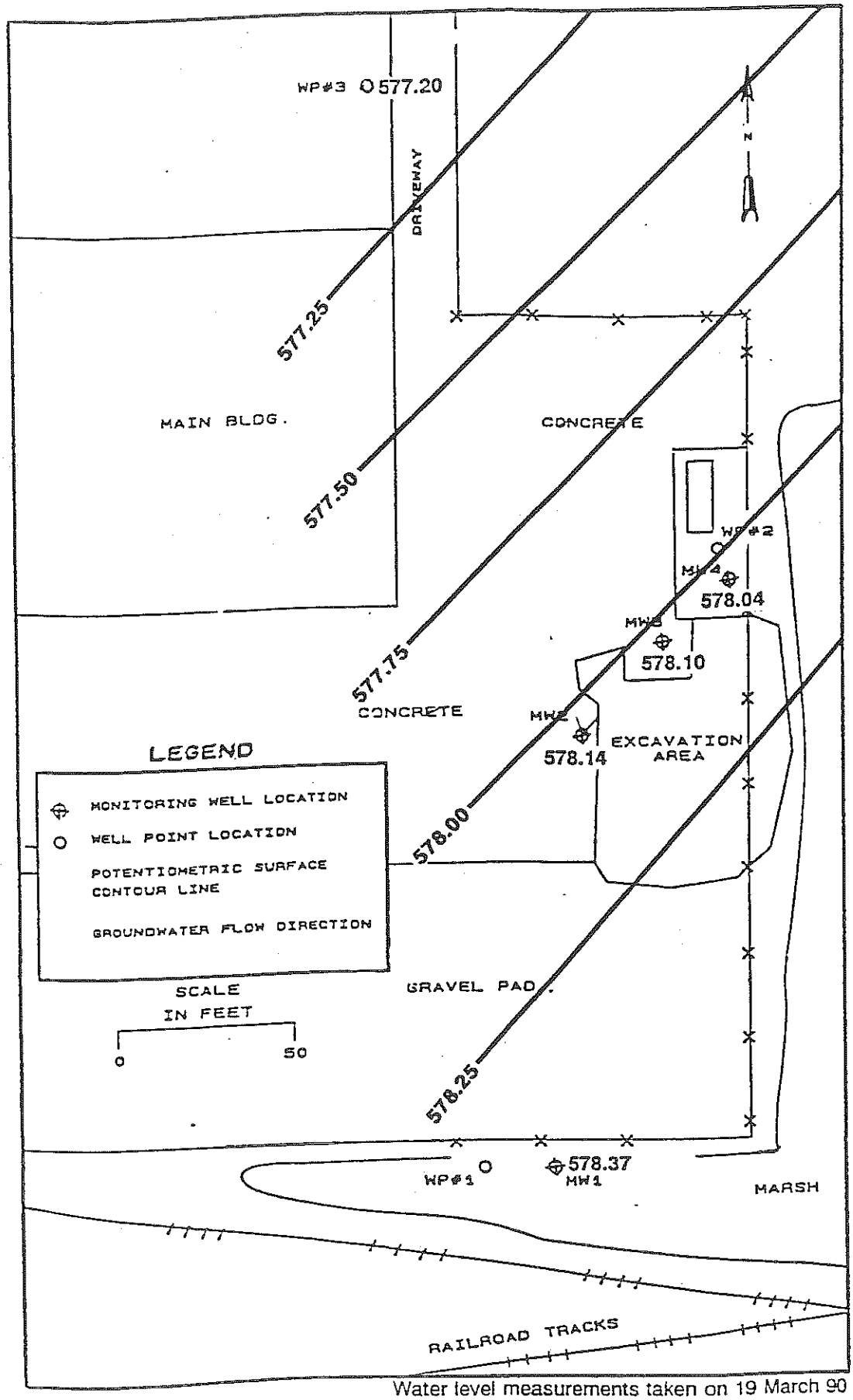
Water level measurements taken on 19 February 90



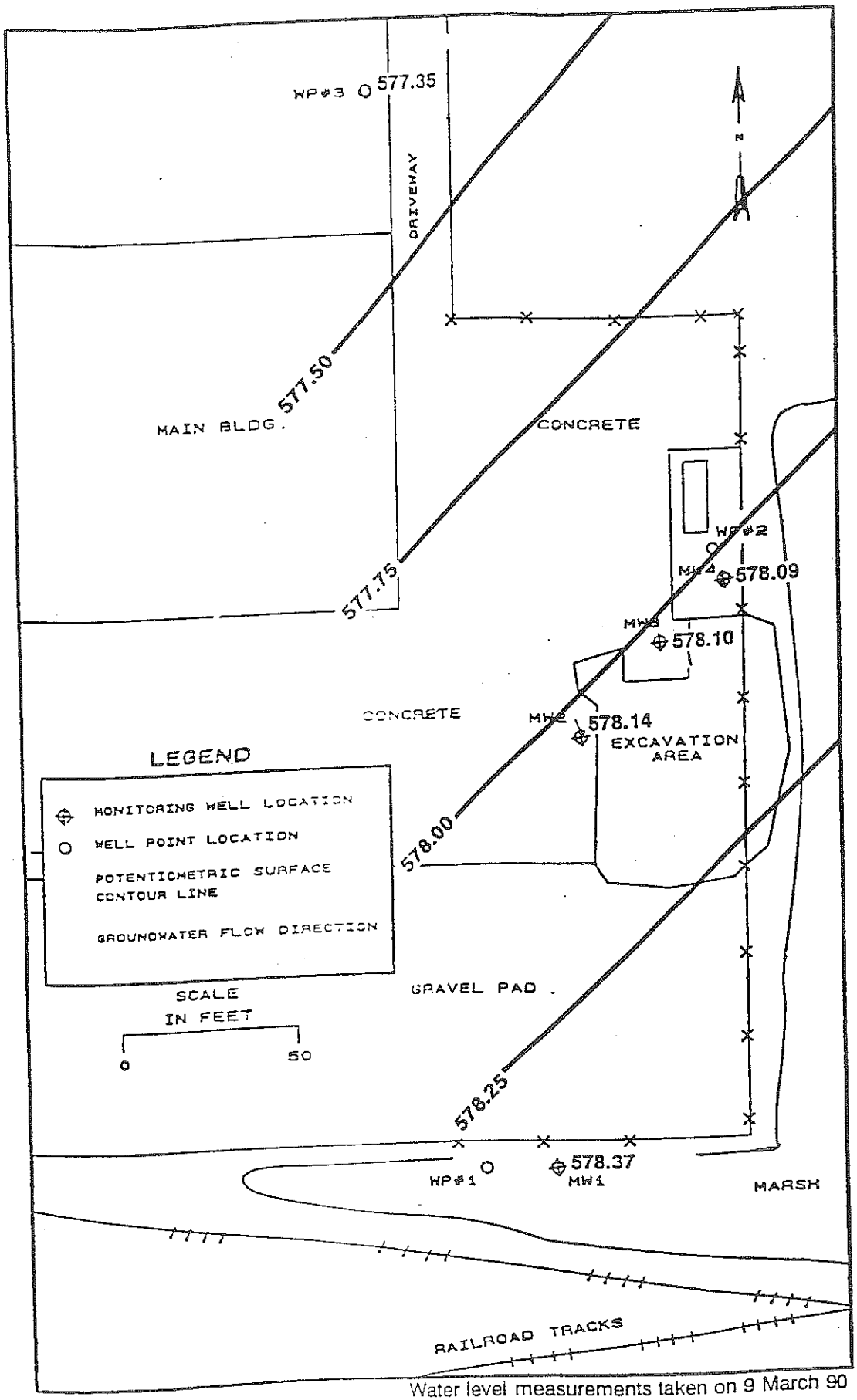
Water level measurements taken on 26 February 90



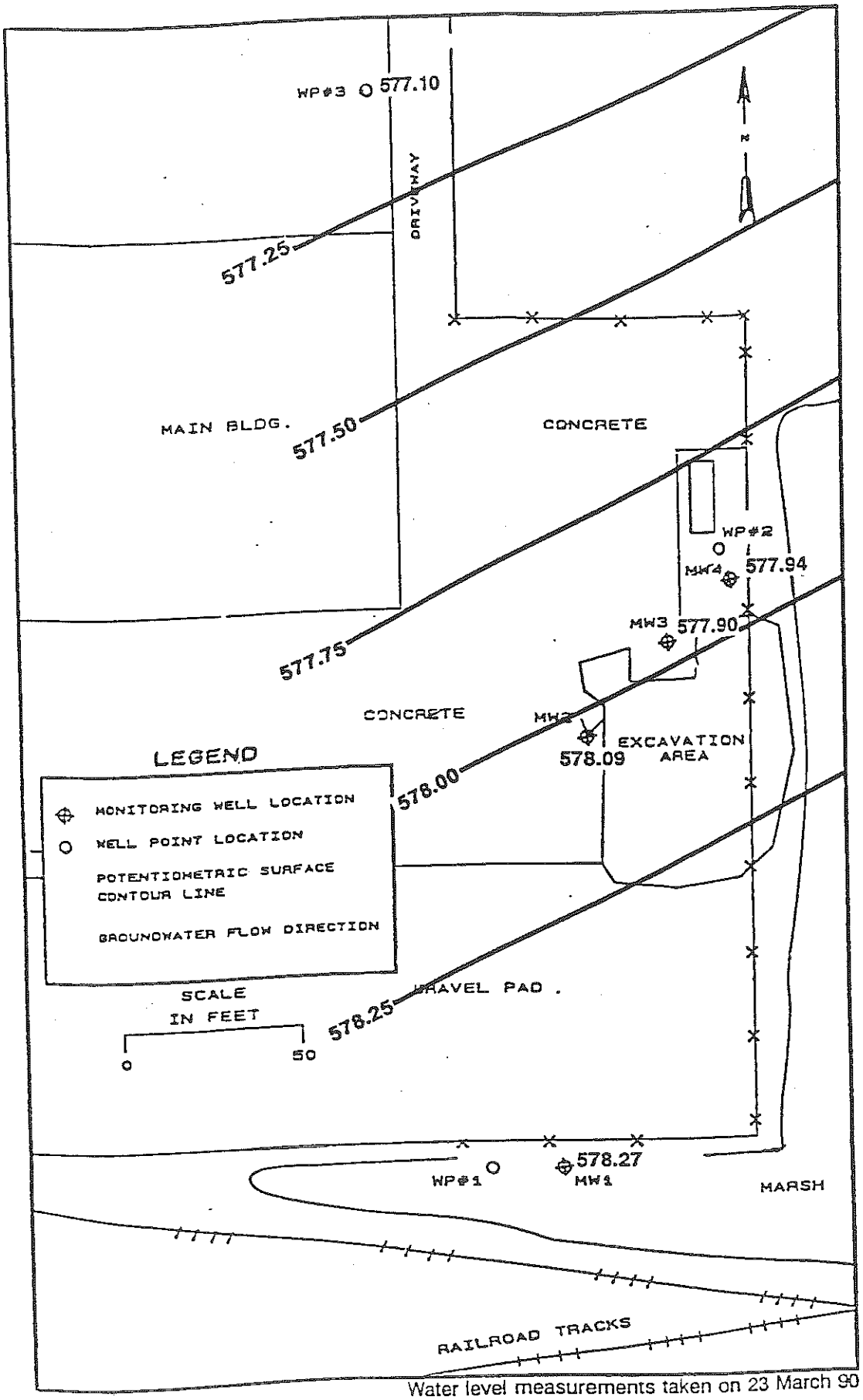
Water level measurements taken on 6 March 90



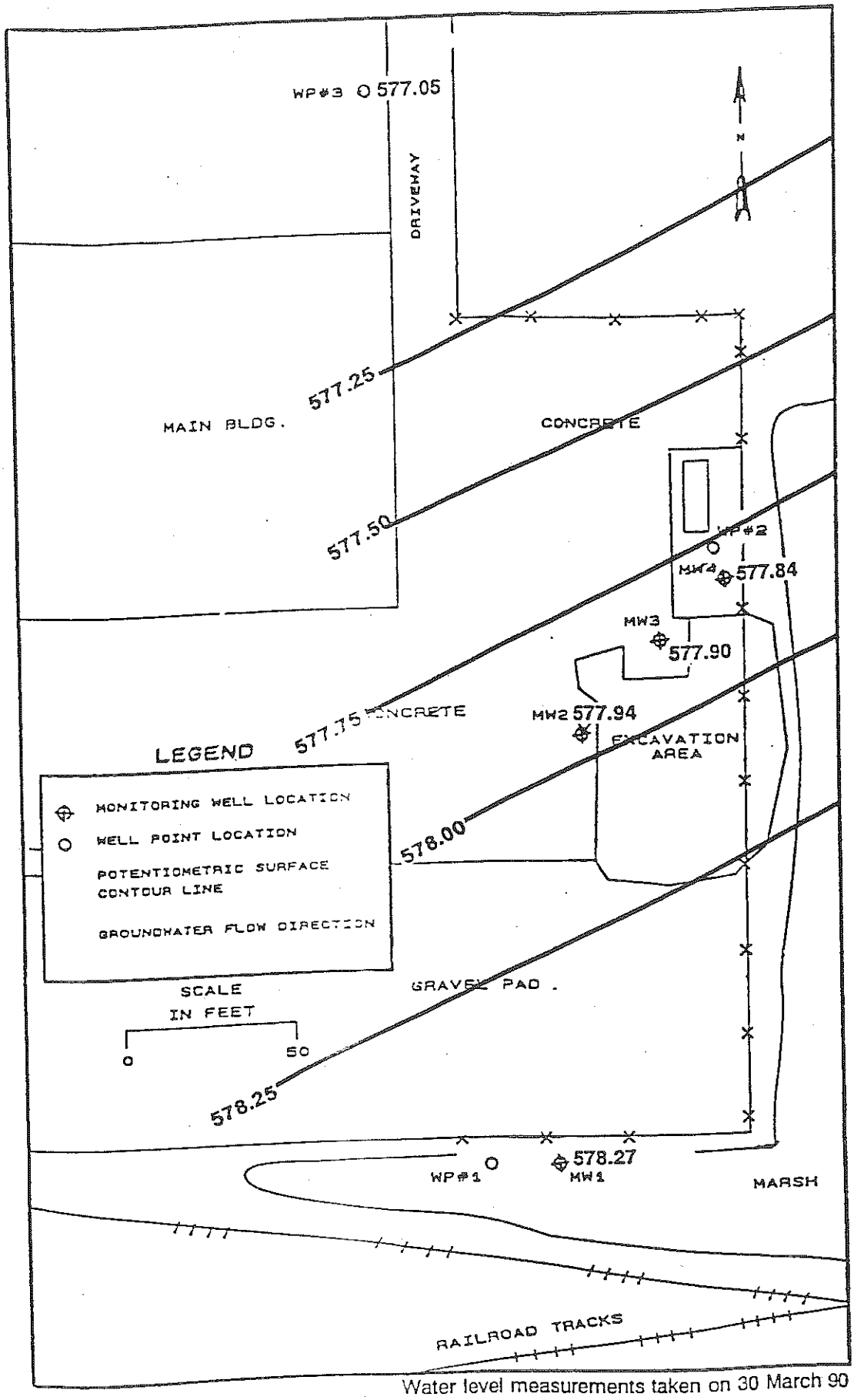
Water level measurements taken on 19 March 90



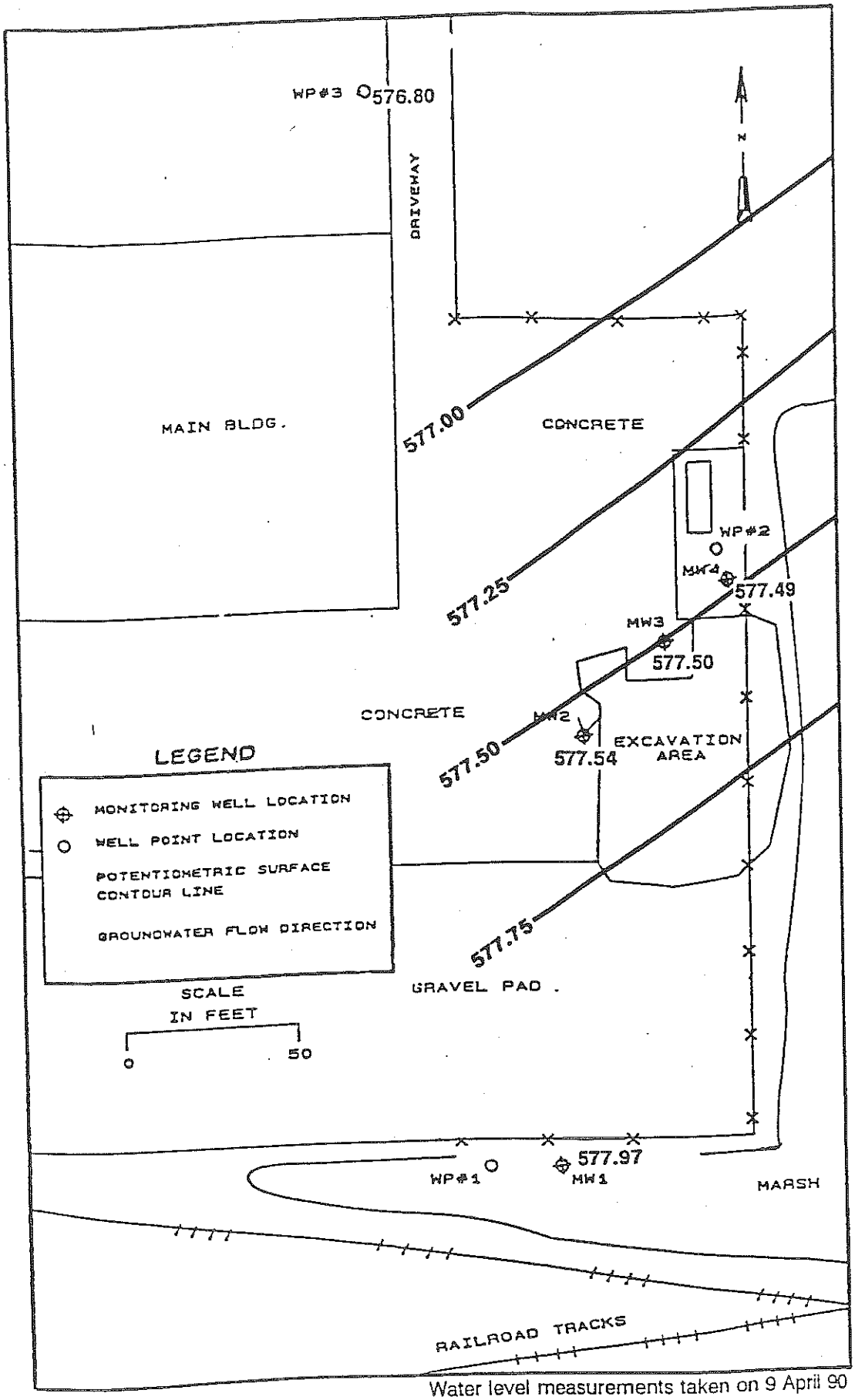
Water level measurements taken on 9 March 90



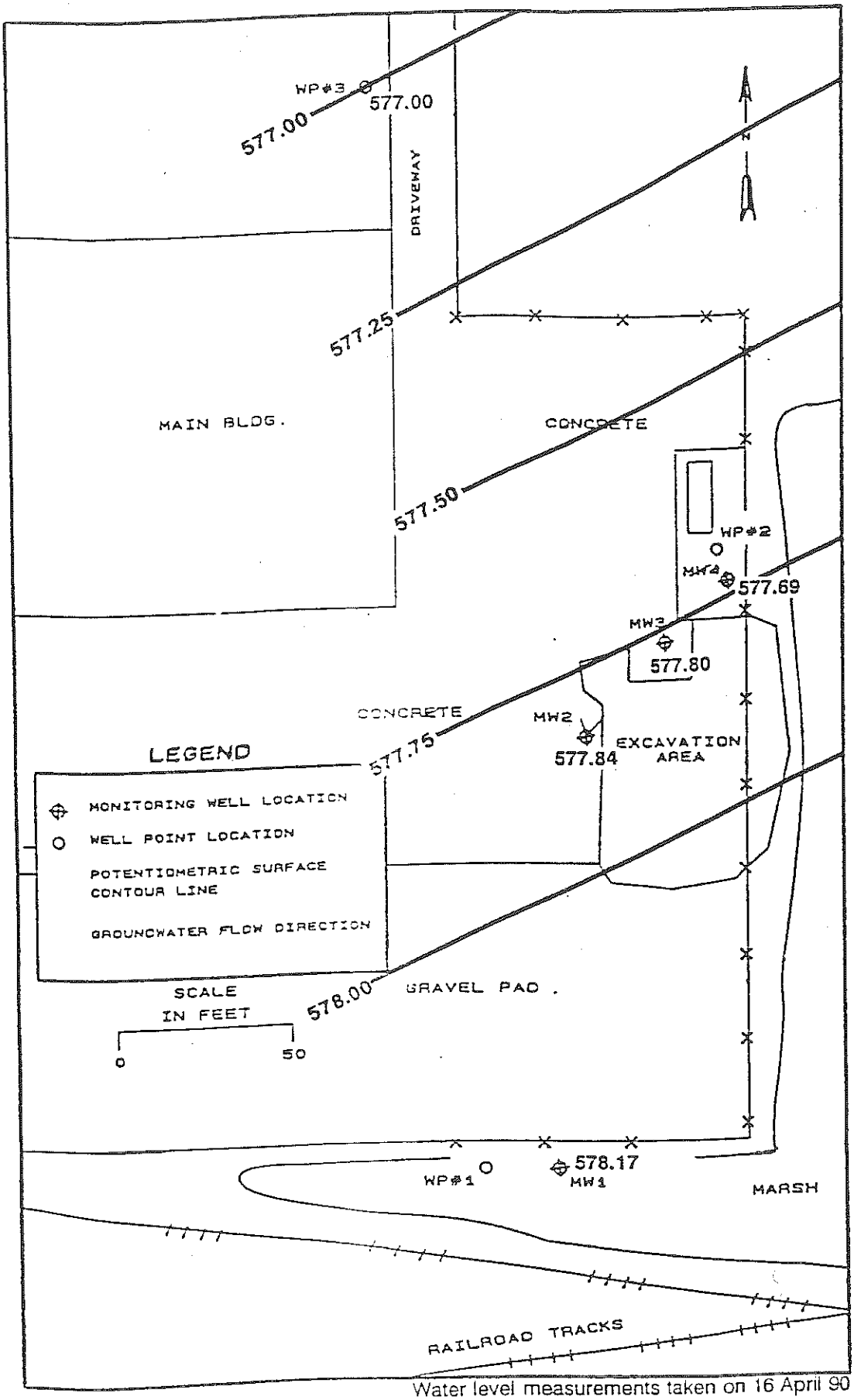
Water level measurements taken on 23 March 90



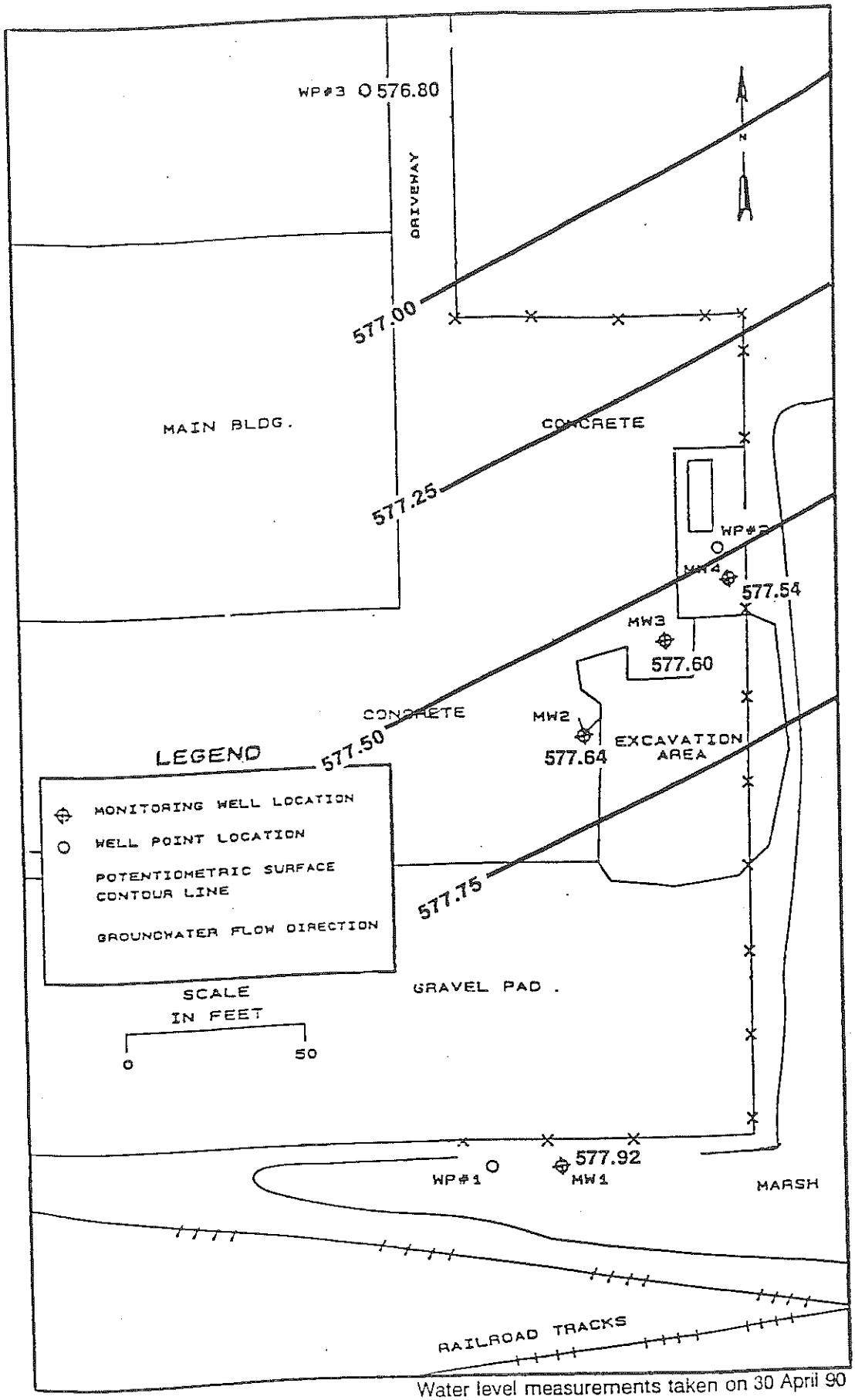
Water level measurements taken on 30 March 90



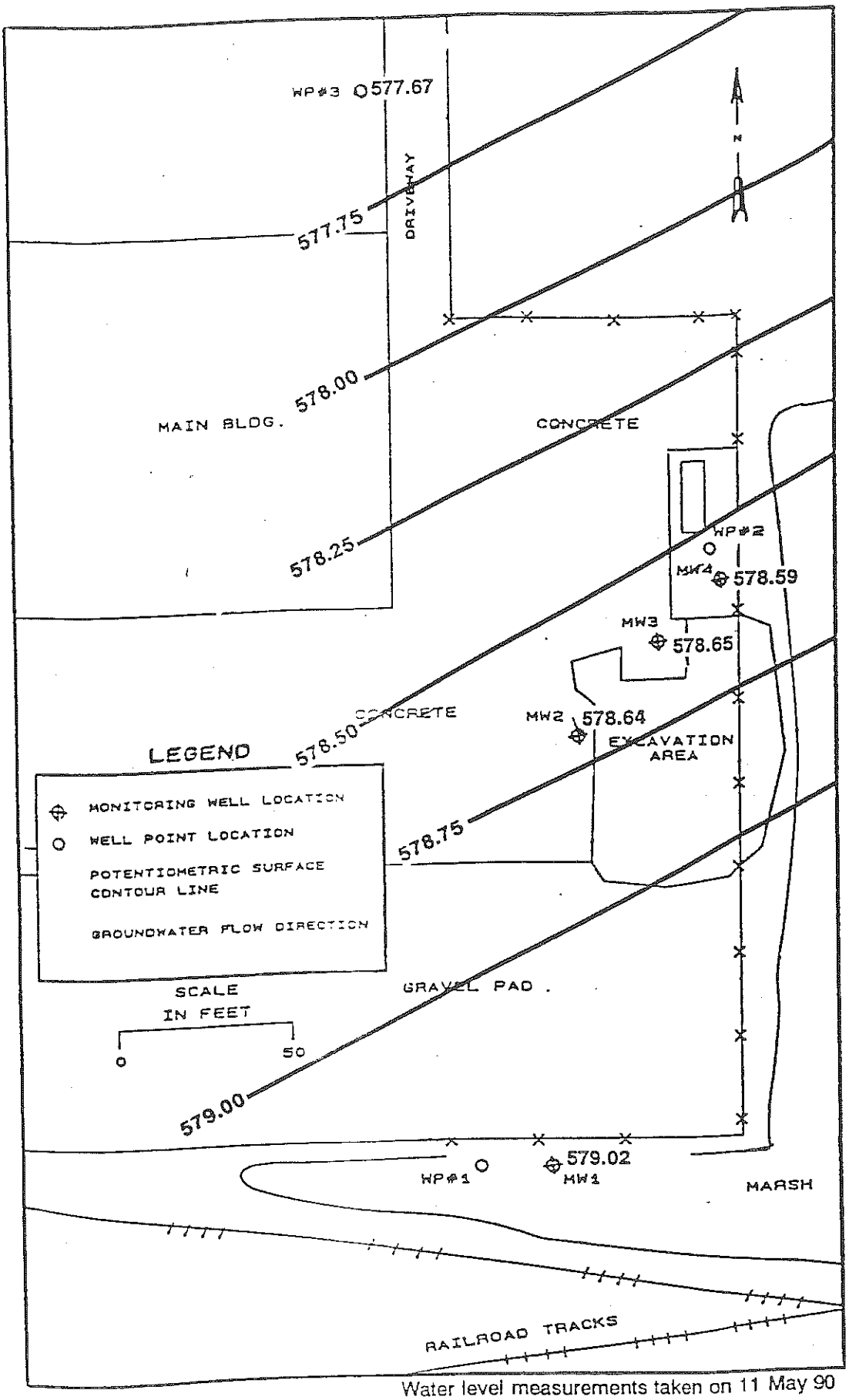
Water level measurements taken on 9 April 90



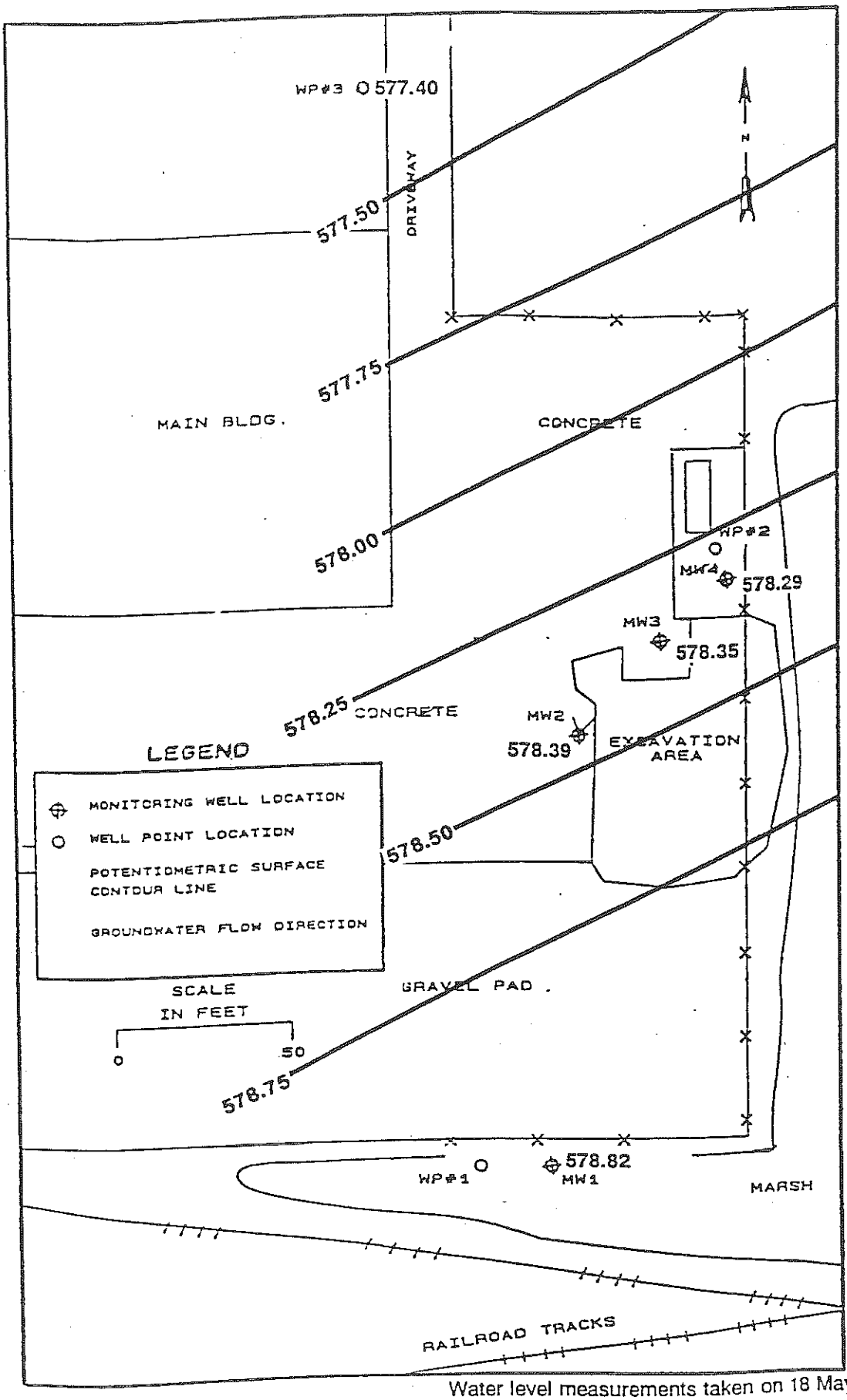
Water level measurements taken on 16 April 90



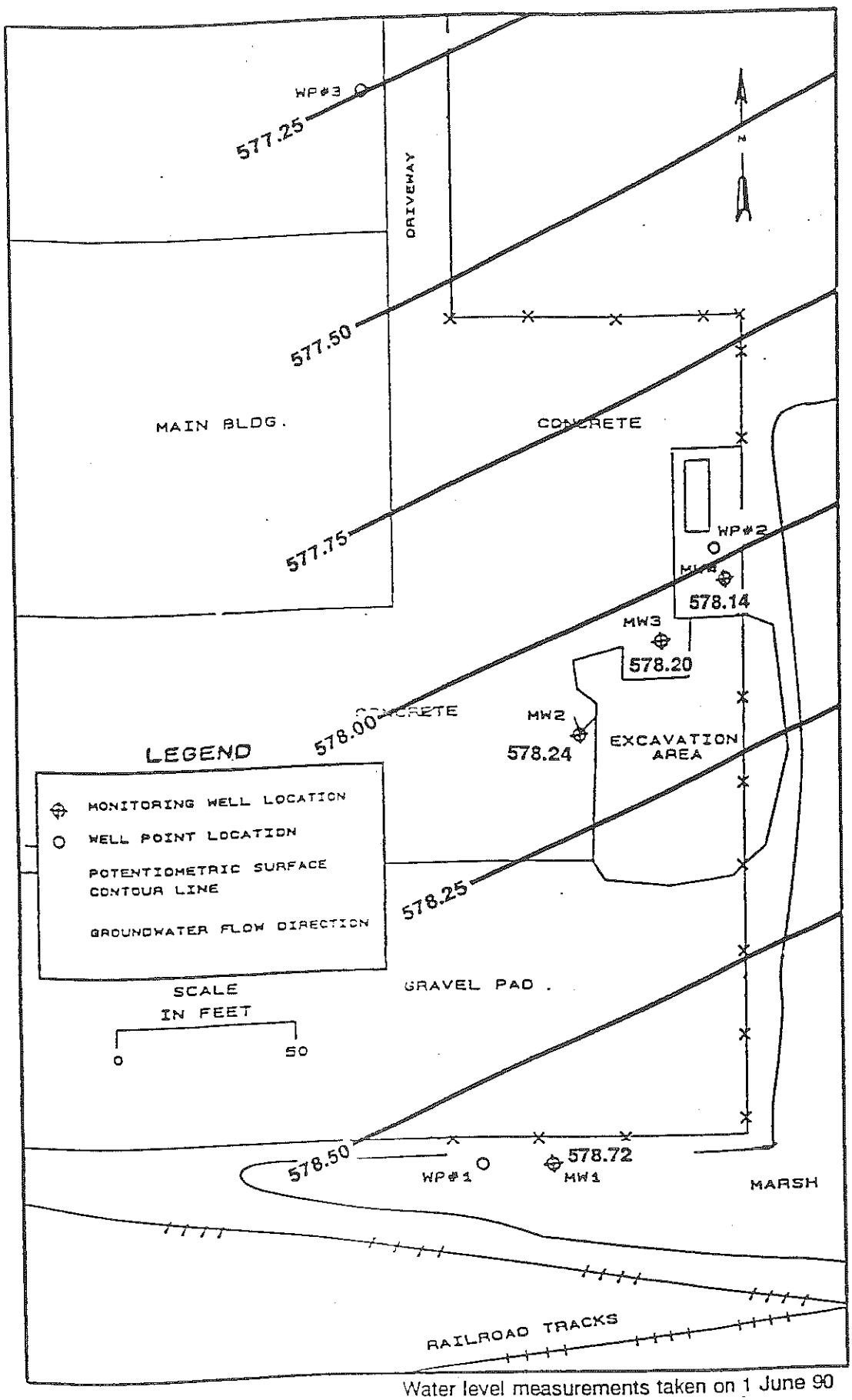
Water level measurements taken on 30 April 90



Water level measurements taken on 11 May 90



Water level measurements taken on 18 May 90



Water level measurements taken on 1 June 90

Attachment B

Beling Consultants

LABORATORY REPORT
September 26, 1989

Mr. Rod Brown
The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

Lab No.: 25610
Received: August 28, 1989
Monitoring Well #1

Depth to Water from M.P. - 4.08 ft.
pH Start - 5.95 pH Finish - 5.75
Conductivity Start - 440 umhos/cm Conductivity Finish - 897 umhos/cm
Temperature - 63°F

	Concentration, mg/L
Chloromethane	<0.01
Bromomethane	<0.01
Vinyl Chloride	<0.01
Chloroethane	<0.01
Methylene Chloride	<0.005
Trichlorofluoromethane	<0.005
1, 1-Dichloroethene	<0.005
1, 1-Dichloroethane	<0.005
1,2-Dichloroethene (total)	<0.005
Chloroform	<0.005
1,2-Dichloroethane	<0.005
1,1,1-Trichloroethane	<0.005
Carbon Tetrachloride	<0.005
Bromodichloromethane	<0.005
1,2-Dichloropropane	<0.005
cis-1,3-Dichloropropene	<0.005
Trichloroethene	<0.005
Dibromochloromethane	<0.01
2-Chloroethyl vinyl ether	<0.005
1,1,2-Trichloroethane	<0.005
Benzene	<0.005
trans-1,3-Dichloropropene	<0.005
Bromoform	<0.005
Tetrachloroethene	<0.005
1,1,2,2-Tetrachloroethane	<0.005
Toluene	<0.005
Chlorobenzene	<0.005
Ethylbenzene	<0.01
Napthalene	<0.1
Lead	

Beling Consultants

LABORATORY REPORT
September 26, 1989

Mr. Rod Brown
The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

Lab No.: 25611
Received: August 28, 1989
Monitoring Well #2

Depth to Water from M.P. - 2.54 ft. 2.45 ft
pH Start - 8.28 pH Finish - 6.77
Conductivity Start - 1335 umhos/cm Conductivity Finish - 1540 umhos/cm
Temperature - 66°F

	Concentration, mg/L
Chloromethane	<0.01
Bromomethane	<0.01
Vinyl Chloride	<0.01
Chloroethane	<0.005
Methylene Chloride	<0.005
Trichlorofluoromethane	<0.005
1, 1-Dichloroethene	<0.005
1, 1-Dichloroethane	<0.005
1,2-Dichloroethene (total)	<0.005
Chloroform	<0.005
1,2-Dichloroethane	<0.005
1,1,1-Trichloroethane	<0.005
Carbon Tetrachloride	<0.005
Bromodichloromethane	<0.005
1,2-Dichloropropane	<0.005
cis-1,3-Dichloropropene	<0.005
Trichloroethene	<0.005
Dibromochloromethane	<0.01
2-Chloroethyl vinyl ether	<0.005
1,1,2-Trichloroethane	<0.005
Benzene	<0.005
trans-1,3-Dichloropropene	<0.005
Bromoform	<0.005
Tetrachloroethene	<0.005
1,1,2,2-Tetrachloroethane	<0.005
Toluene	<0.005
Chlorobenzene	<0.005
Ethylbenzene	<0.01
Napthalene	<0.1
Lead	

Jeffrey A. Vanura

Beling Consultants

LABORATORY REPORT
September 26, 1989

Mr. Rod Brown
The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

Lab No.: 25612
Received: August 28, 1989
Monitoring Well #3

Depth to Water from M.P. - 2.50 ft. 2.5 ft
pH Start - 9.70 pH Finish - 6.90
Conductivity Start - 449 umhos/cm Conductivity Finish - 1192 umhos/cm
Temperature - 69°F

	Concentration, mg/L
Chloromethane	<0.01
Bromomethane	<0.01
Vinyl Chloride	<0.01
Chloroethane	<0.01
Methylene Chloride	<0.005
Trichlorofluoromethane	<0.005
1, 1-Dichloroethene	<0.005
1, 1-Dichloroethane	<0.005
1,2-Dichloroethene (total)	<0.005
Chloroform	<0.005
1,2-Dichloroethane	<0.005
1,1,1-Trichloroethane	<0.005
Carbon Tetrachloride	<0.005
Bromodichloromethane	<0.005
1,2-Dichloropropane	<0.005
cis-1,3-Dichloropropene	<0.005
Trichloroethene	<0.005
Dibromochloromethane	<0.005
2-Chloroethyl vinyl ether	<0.01
1,1,2-Trichloroethane	<0.005
Benzene	<0.005
trans-1,3-Dichloropropene	<0.005
Bromoform	<0.005
Tetrachloroethene	<0.005
1,1,2,2-Tetrachloroethane	<0.005
Toluene	<0.005
Chlorobenzene	<0.005
Ethylbenzene	<0.005
Napthalene	<0.01
Lead	<0.1

John A. Wamm

Beling Consultants

LABORATORY REPORT
September 26, 1989

Mr. Rod Brown
The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

Lab No.: 25613
Received: August 28, 1989
Monitoring Well #4

Depth to Water from M.P. - 5.14 ft. 5.05 ft
pH Start - 8.45 pH Finish - 7.45
Conductivity Start - 1668 umhos/cm Conductivity Finish - 1631 umhos/cm
Temperature - 62°F

	Concentration, mg/L
Chloromethane	<0.01
Bromomethane	<0.01
Vinyl Chloride	<0.01
Chloroethane	<0.01
Methylene Chloride	<0.005
Trichlorofluoromethane	<0.005
1, 1-Dichloroethene	<0.005
1, 1-Dichloroethane	<0.005
1,2-Dichloroethene (total)	<0.005
Chloroform	<0.005
1,2-Dichloroethane	<0.005
1,1,1-Trichloroethane	<0.005
Carbon Tetrachloride	<0.005
Bromodichloromethane	<0.005
1,2-Dichloropropane	<0.005
cis-1,3-Dichloropropene	<0.005
Trichloroethene	<0.005
Dibromochloromethane	<0.01
2-Chloroethyl vinyl ether	<0.005
1,1,2-Trichloroethane	<0.005
Benzene	<0.005
trans-1,3-Dichloropropene	<0.005
Bromoform	<0.005
Tetrachloroethene	<0.005
1,1,2,2-Tetrachloroethane	<0.005
Toluene	<0.005
Chlorobenzene	<0.005
Ethylbenzene	<0.01
Napthalene	<0.1
Lead	

Jeffrey A. Vanni

Beling Consultants

LABORATORY REPORT

December 21, 1989

Mr. Rod Brown
The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

Lab No.: 27079
Received: 11/9/89
Collection point: Well #1

Depth to Water from M.P. - 4.36 ft.
pH Start - 8.72 pH Finish - 6.83
Conductivity Start - 1130 umhos/cm Conductivity Finish - 1640 umhos/cm
Temperature - 55oF

	mg/L
Chloromethane	<0.01
Bromomethane	<0.01
Vinyl Chloride	<0.01
Chloroethane	<0.01
Methylene Chloride	<0.005
Trichlorofluoromethane	<0.005
1,1-Dichloroethene	<0.005
1,1-Dichloroethane	<0.005
1,2-Dichloroethene (total)	<0.005
Chloroform	<0.005
1,2-Dichloroethane	<0.005
1,1,1-Trichloroethane	<0.005
Carbon Tetrachloride	<0.005
Bromodichloromethane	<0.005
1,2-Dichloropropane	<0.005
cis-1,3-Dichloropropene	<0.005
Trichloroethene	<0.005
Dibromochloromethane	<0.01
2-Chloroethyl vinyl ether	<0.005
1,1,2-Trichloroethane	<0.005
Benzene	<0.005
trans-1,3-Dichloropropene	<0.005
Bromoform	<0.005
Tetrachloroethene	<0.005
1,1,2,2-Tetrachloroethane	<0.005
Toluene	<0.005
Chlorobenzene	<0.005
Ethylbenzene	0.1
Lead	<0.01
Napthalene	

Jeffrey A. Wasson

Beling Consultants

LABORATORY REPORT
December 21, 1989

Mr. Rod Brown
The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

Lab No.: 27080
Received: 11/9/89
Collection point: Well #2

Depth to Water from M.P. - 2.72 ft. 11/10 Reads 2.7 ft
pH Start - 6.83 pH Finish - 6.90
Conductivity Start - 970 umhos/cm Conductivity Finish - 1540 umhos/cm
Temperature - 58oF

	mg/L
Chloromethane	<0.01
Bromomethane	<0.01
Vinyl Chloride	<0.01
Chloroethane	<0.01
Methylene Chloride	<0.005
Trichlorofluoromethane	<0.005
1,1-Dichloroethene	<0.005
1,1-Dichloroethane	<0.005
1,2-Dichloroethene (total)	<0.005
Chloroform	<0.005
1,2-Dichloroethane	<0.005
1,1,1-Trichloroethane	<0.005
Carbon Tetrachloride	<0.005
Bromodichloromethane	<0.005
1,2-Dichloropropane	<0.005
cis-1,3-Dichloropropene	<0.005
Trichloroethene	<0.005
Dibromochloromethane	<0.005
2-Chloroethyl vinyl ether	<0.01
1,1,2-Trichloroethane	<0.005
Benzene	<0.005
trans-1,3-Dichloropropene	<0.005
Bromoform	<0.005
Tetrachloroethene	<0.005
1,1,2,2-Tetrachloroethane	<0.005
Toluene	<0.005
Chlorobenzene	<0.005
Ethylbenzene	<0.005
Lead	0.1
Napthalene	<0.01

J. Wm O. Warren

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LABORATORY REPORT
December 21, 1989

Mr. Rod Brown
The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

Lab No.: 27081
Received: 11/9/89
Collection point: Well #3

Depth to Water from M.P. - 2.72 ft. 11/17/89 2.7 ft
pH Start - 6.65 pH Finish - 6.57
Conductivity Start - 870 umhos/cm Conductivity Finish - 1170 umhos/cm
Temperature - 58oF

	mg/L
Chloromethane	<0.01
Bromomethane	<0.01
Vinyl Chloride	<0.01
Chloroethane	<0.01
Methylene Chloride	<0.005
Trichlorofluoromethane	<0.005
1,1-Dichloroethene	<0.005
1,1-Dichloroethane	<0.005
1,2-Dichloroethene (total)	<0.005
Chloroform	<0.005
1,2-Dichloroethane	<0.005
1,1,1-Trichloroethane	<0.005
Carbon Tetrachloride	<0.005
Bromodichloromethane	<0.005
1,2-Dichloropropane	<0.005
cis-1,3-Dichloropropene	<0.005
Trichloroethene	<0.005
Dibromochloromethane	<0.005
2-Chloroethyl vinyl ether	<0.01
1,1,2-Trichloroethane	<0.005
Benzene	<0.005
trans-1,3-Dichloropropene	<0.005
Bromoform	<0.005
Tetrachloroethene	<0.005
1,1,2,2-Tetrachloroethane	<0.005
Toluene	<0.005
Chlorobenzene	<0.005
Ethylbenzene	<0.005
Lead	0.1
Napthalene	<0.01

Jeffrey O. Brown

Beling Consultants

LABORATORY REPORT
December 21, 1989

Mr. Rod Brown
The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

Lab No.: 27082
Received: 11/9/89
Collection point: Well #4

Depth to Water from M.P. - 5.32 ft. WATER RISING 5.31 ft
pH Start - 7.02 pH Finish - 6.93
Conductivity Start - 1260 umhos/cm Conductivity Finish - 1460 umhos/cm
Temperature - 55oF

	mg/L
Chloromethane	<0.01
Bromomethane	<0.01
Vinyl Chloride	<0.01
Chloroethane	<0.01
Methylene Chloride	<0.005
Trichlorofluoromethane	<0.005
1,1-Dichloroethene	<0.005
1,1-Dichloroethane	<0.005
1,2-Dichloroethene (total)	<0.005
Chloroform	<0.005
1,2-Dichloroethane	<0.005
1,1,1-Trichloroethane	<0.005
Carbon Tetrachloride	<0.005
Bromodichloromethane	<0.005
1,2-Dichloropropane	<0.005
cis-1,3-Dichloropropene	<0.005
Trichloroethene	<0.005
Dibromochloromethane	<0.01
2-Chloroethyl vinyl ether	<0.005
1,1,2-Trichloroethane	<0.005
Benzene	<0.005
trans-1,3-Dichloropropene	<0.005
Bromoform	<0.005
Tetrachloroethene	<0.005
1,1,2,2-Tetrachloroethane	<0.005
Toluene	<0.005
Chlorobenzene	<0.005
Ethylbenzene	<0.1
Lead	<0.01
Napthalene	

Jeffrey A. Warren

BELING
CONSULTANTS

LABORATORY REPORT

March 22, 1990

Professional Planning and Engineering . Environmental Laboratory

Mr. Rod Brown
The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

Lab No.: 29056
Received: February 9, 1990
Collection point: Well #1

Depth to Water from M.P. - 4.60 ft.
pH Start - 6.90 pH Finish - 7.11
Conductivity Start - 1210 umhos/cm Conductivity Finish - 1590 umhos/cm
Temperature - 49oF

	mg/L
Chloromethane	<0.01
Bromomethane	<0.01
Vinyl Chloride	<0.01
Chloroethane	<0.01
Methylene Chloride	<0.005
Trichlorofluoromethane	<0.005
1,1-Dichloroethene	<0.005
1,1-Dichloroethane	<0.005
1,2-Dichloroethene (total)	<0.005
Chloroform	<0.005
1,2-Dichloroethane	<0.005
1,1,1-Trichloroethane	<0.005
Carbon Tetrachloride	<0.005
Bromodichloromethane	<0.005
1,2-Dichloropropane	<0.005
cis-1,3-Dichloropropene	<0.005
Trichloroethene	<0.005
Dibromochloromethane	<0.005
2-Chloroethyl vinyl ether	<0.01
1,1,2-Trichloroethane	<0.005
Benzene	<0.005
trans-1,3-Dichloropropene	<0.005
Bromoform	<0.005
Tetrachloroethene	<0.005
1,1,2,2-Tetrachloroethane	<0.005
Toluene	<0.005
Chlorobenzene	<0.005
Ethylbenzene	<0.005
Lead	<0.1
Napthalene	<0.010

BELING CONSULTANTS

LABORATORY REPORT
March 22, 1990

Professional Planning and Engineering . Environmental Laboratory

Mr. Rod Brown
The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

Lab No.: 29057
Received: February 9, 1990
Collection point: Well #2

Depth to Water from M.P. - 3.00 ft. 3.0'
pH Start - 8.01 pH Finish - 7.19
Conductivity Start - 1030 umhos/cm Conductivity Finish - 1540 umhos/cm
Temperature - 43oF

	mg/L
Chloromethane	<0.01
Bromomethane	<0.01
Vinyl Chloride	<0.01
Chloroethane	<0.01
Methylene Chloride	<0.005
Trichlorofluoromethane	<0.005
1,1-Dichloroethene	<0.005
1,1-Dichloroethane	<0.005
1,2-Dichloroethene (total)	<0.005
Chloroform	<0.005
1,2-Dichloroethane	<0.005
1,1,1-Trichloroethane	<0.005
Carbon Tetrachloride	<0.005
Bromodichloromethane	<0.005
1,2-Dichloropropane	<0.005
cis-1,3-Dichloropropene	<0.005
Trichloroethene	<0.005
Dibromochloromethane	<0.005
2-Chloroethyl vinyl ether	<0.01
1,1,2-Trichloroethane	<0.005
Benzene	<0.005
trans-1,3-Dichloropropene	<0.005
Bromoform	<0.005
Tetrachloroethene	<0.005
1,1,2,2-Tetrachloroethane	<0.005
Toluene	<0.005
Chlorobenzene	<0.005
Ethylbenzene	<0.005
Lead	<0.1
Napthalene	<0.010

Jeffrey A Wasson
JAW

BELING CONSULTANTS

LABORATORY REPORT
March 22, 1990

Professional Planning and Engineering . Environmental Laboratory

Mr. Rod Brown
The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

Lab No.: 29058
Received: February 9, 1990
Collection point: Well #3

Depth to Water from M.P. - 2.96 ft. 30'
pH Start - 7.48 pH Finish - 7.08
Conductivity Start - 860 umhos/cm Conductivity Finish - 1300 umhos/cm
Temperature - 45oF

	mg/L
Chloromethane	<0.01
Bromomethane	<0.01
Vinyl Chloride	<0.01
Chloroethane	<0.01
Methylene Chloride	<0.005
Trichlorofluoromethane	<0.005
1,1-Dichloroethene	<0.005
1,1-Dichloroethane	<0.005
1,2-Dichloroethene (total)	<0.005
Chloroform	<0.005
1,2-Dichloroethane	<0.005
1,1,1-Trichloroethane	<0.005
Carbon Tetrachloride	<0.005
Bromodichloromethane	<0.005
1,2-Dichloropropane	<0.005
cis-1,3-Dichloropropene	<0.005
Trichloroethene	<0.005
Dibromochloromethane	<0.005
2-Chloroethyl vinyl ether	<0.01
1,1,2-Trichloroethane	<0.005
Benzene	<0.005
trans-1,3-Dichloropropene	<0.005
Bromoform	<0.005
Tetrachloroethene	<0.005
1,1,2,2-Tetrachloroethane	<0.005
Toluene	<0.005
Chlorobenzene	<0.005
Ethylbenzene	<0.005
Lead	<0.1
Napthalene	<0.010

Jeffrey A. Wamm

BELING CONSULTANTS

LABORATORY REPORT
March 22, 1990

Professional Planning and Engineering . Environmental Laboratory

Mr. Rod Brown
The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

Lab No.: 29059
Received: February 9, 1990
Collection point: Well #4

Depth to Water from M.P. - 5.58 ft. 5.65'
pH Start - 7.40 pH Finish - 7.10
Conductivity Start - 1180 umhos/cm Conductivity Finish - 1590 umhos/cm
Temperature - 46oF

	mg/L
Chloromethane	<0.01
Bromomethane	<0.01
Vinyl Chloride	<0.01
Chloroethane	<0.01
Methylene Chloride	<0.005
Trichlorofluoromethane	<0.005
1,1-Dichloroethene	<0.005
1,1-Dichloroethane	<0.005
1,2-Dichloroethene (total)	<0.005
Chloroform	<0.005
1,2-Dichloroethane	<0.005
1,1,1-Trichloroethane	<0.005
Carbon Tetrachloride	<0.005
Bromodichloromethane	<0.005
1,2-Dichloropropane	<0.005
cis-1,3-Dichloropropene	<0.005
Trichloroethene	<0.005
Dibromochloromethane	<0.005
2-Chloroethyl vinyl ether	<0.01
1,1,2-Trichloroethane	<0.005
Benzene	<0.005
trans-1,3-Dichloropropene	<0.005
Bromoform	<0.005
Tetrachloroethene	<0.005
1,1,2,2-Tetrachloroethane	<0.005
Toluene	<0.005
Chlorobenzene	0.005
Ethylbenzene	<0.005
Lead	<0.1
Napthalene	<0.010

Jeffrey A. Wamm

BELING CONSULTANTS

LABORATORY REPORT

July 6, 1990

Professional Planning and Engineering . Environmental Laboratory

Mr. Bill Smith
The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

Lab No. 31724
Received: May 16, 1990
Collection Point: MW #1

Depth to Water from M.P. - 2.76 ft.
pH Start - 7.30 pH Finish - 7.30
Conductivity Start - 514 umhos/cm
Conductivity Finish - 1370 umhos/cm
Temperature - 54° F

	Concentration, mg/L
Chloromethane	<0.01
Bromomethane	<0.01
Vinyl Chloride	<0.01
Chloroethane	<0.01
Methylene Chloride	<0.005
Acetone	<0.01
Carbon Disulfide	<0.005
1,1-Dichloroethene	<0.005
1,1-Dichloroethane	<0.005
1,2-Dichloroethene (Total)	<0.005
Chloroform	<0.005
1,2-Dichloroethane	<0.005
2-Butanone	<0.01
1,1,1-Trichloroethane	<0.005
Carbon Tetrachloride	<0.005
Vinyl Acetate	<0.01
Bromodichloromethane	<0.005
1,2-Dichloropropane	<0.005
cis-1,3-Dichloropropene	<0.005
Trichloroethene	<0.005
Dibromochloromethane	<0.005
1,1,2-Trichloroethane	<0.005
Benzene	<0.005
trans-1,3-Dichloropropene	<0.005
Bromoform	<0.005

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Lab No. 31724
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4-Methyl-2-Pentanone	<0.01
2-Hexanone	<0.01
Tetrachloroethene	<0.005
1,1,2,2-Tetrachloroethane	<0.005
Toluene	<0.005
Chlorobenzene	<0.005
Ethylbenzene	<0.005
Styrene	<0.005
Xylene (total)	<0.005
Lead	<0.05
Napthalene	<0.01

Jeffrey A. Warn

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Professional Planning and Engineering . Environmental Laboratory

LABORATORY REPORT

July 6, 1990

Mr. Bill Smith
The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

Lab No. 31725
Received: May 16, 1990
Collection Point: MW #2

Depth to Water from M.P. - 1.70 ft.
pH Start - 8.12 pH Finish - 7.23
Conductivity Start - 1170 umhos/cm
Conductivity Finish - 1560 umhos/cm
Temperature - 53° F

	Concentration, mg/L
Chloromethane	<0.01
Bromomethane	<0.01
Vinyl Chloride	<0.01
Chloroethane	<0.01
Methylene Chloride	<0.005
Acetone	<0.01
Carbon Disulfide	<0.005
1,1-Dichloroethene	<0.005
1,1-Dichloroethane	<0.005
1,2-Dichloroethene (Total)	<0.005
Chloroform	<0.005
1,2-Dichloroethane	<0.005
2-Butanone	<0.01
1,1,1-Trichloroethane	<0.005
Carbon Tetrachloride	<0.005
Vinyl Acetate	<0.01
Bromodichloromethane	<0.005
1,2-Dichloropropane	<0.005
cis-1,3-Dichloropropene	<0.005
Trichloroethene	<0.005
Dibromochloromethane	<0.005
1,1,2-Trichloroethane	<0.005
Benzene	<0.005
trans-1,3-Dichloropropene	<0.005
Bromoform	<0.005

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Lab No. 31725
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4-Methyl-2-Pentanone	<0.01
2-Hexanone	<0.01
Tetrachloroethene	<0.005
1,1,2,2-Tetrachloroethane	<0.005
Toluene	<0.005
Chlorobenzene	<0.005
Ethylbenzene	<0.005
Styrene	<0.005
Xylene (total)	<0.005
Lead	<0.05
Napthalene	<0.01

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Professional Planning and Engineering . Environmental Laboratory

LABORATORY REPORT

July 6, 1990

Mr. Bill Smith
The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

Lab No. 31726
Received: May 16, 1990
Collection Point: MW #3

Depth to Water from M.P. - 1.401 ft.
pH Start - 7.73 pH Finish - 7.26
Conductivity Start - 710 umhos/cm
Conductivity Finish - 1105 umhos/cm
Temperature - 52° F

	Concentration, mg/L
Chloromethane	<0.01
Bromomethane	<0.01
Vinyl Chloride	<0.01
Chloroethane	<0.01
Methylene Chloride	<0.005
Acetone	<0.01
Carbon Disulfide	<0.005
1,1-Dichloroethene	<0.005
1,1-Dichloroethane	<0.005
1,2-Dichloroethene (Total)	<0.005
Chloroform	<0.005
1,2-Dichloroethane	<0.005
2-Butanone	<0.01
1,1,1-Trichloroethane	<0.005
Carbon Tetrachloride	<0.005
Vinyl Acetate	<0.01
Bromodichloromethane	<0.005
1,2-Dichloropropane	<0.005
cis-1,3-Dichloropropene	<0.005
Trichloroethene	<0.005
Dibromochloromethane	<0.005
1,1,2-Trichloroethane	<0.005
Benzene	<0.005
trans-1,3-Dichloropropene	<0.005
Bromoform	<0.005

Jeffrey A. Wesson

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Lab No. 31726
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4-Methyl-2-Pentanone	<0.01
2-Hexanone	<0.01
Tetrachloroethene	<0.005
1,1,2,2-Tetrachloroethane	<0.005
Toluene	<0.005
Chlorobenzene	<0.005
Ethylbenzene	<0.005
Styrene	<0.005
Xylene (total)	<0.005
Lead	<0.05
Napthalene	<0.01

Jeffrey A. Wasson

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LABORATORY REPORT

July 6, 1990

Mr. Bill Smith
The Valspar Corporation
2500 8th Avenue
East Moline, Illinois 61244

Lab No. 31727
Received: May 16, 1990
Collection Point: MW #4

Depth to Water from M.P. - 3.76 ft.
pH Start - 8.30 pH Finish - 7.37
Conductivity Start - 1161 umhos/cm
Conductivity Finish - 1600 umhos/cm
Temperature - 53° F

	Concentration, mg/L
Chloromethane	<0.01
Bromomethane	<0.01
Vinyl Chloride	<0.01
Chloroethane	<0.01
Methylene Chloride	<0.005
Acetone	<0.01
Carbon Disulfide	<0.005
1,1-Dichloroethene	<0.005
1,1-Dichloroethane	<0.005
1,2-Dichloroethene (Total)	<0.005
Chloroform	<0.005
1,2-Dichloroethane	<0.005
2-Butanone	<0.01
1,1,1-Trichloroethane	<0.005
Carbon Tetrachloride	<0.005
Vinyl Acetate	<0.01
Bromodichloromethane	<0.005
1,2-Dichloropropane	<0.005
cis-1,3-Dichloropropene	<0.005
Trichloroethene	<0.005
Dibromochloromethane	<0.005
1,1,2-Trichloroethane	<0.005
Benzene	<0.005
trans-1,3-Dichloropropene	<0.005
Bromoform	<0.005

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LABORATORY REPORT

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4-Methyl-2-Pentanone	<0.01
2-Hexanone	<0.01
Tetrachloroethene	<0.005
1,1,2,2-Tetrachloroethane	<0.005
Toluene	<0.005
Chlorobenzene	<0.005
Ethylbenzene	<0.005
Styrene	<0.005
Xylene (total)	<0.005
Lead	<0.05
Napthalene	<0.01

Jeffrey A. Warren